

1. Preamble

We as Favorites Group, Inc. (“**Favorites Group**”), give utmost importance to the privacy of our Visitors and Users during their use of our website with domain name www.favoritan.com (“**Website**”) and Favoritan Application (collectively “**Favoritan Platform**”) regardless of their country of access.

2. Purpose of This Policy

This Privacy Policy (“**Policy**”) is prepared with a privacy-prioritizing attitude in order to provide detailed information to Visitors and Users regarding the identity of Favorites Group as a data controller; data processing and its legal bases, reasons; rights of Visitors and Users (collectively “**Data Subject**”), which can be exercised against Favorites Group.

3. Scope of This Policy

a. In Terms of Legislation

Since, Favorites Group is a USA based company but has numerous Visitors and Users from different countries; it is hard to determine which legislation should be applied to its activities and business. Therefore, Favorites Group intends to reflect its compliance with different legislations about privacy and data protection. For this reason, Favorites Group shows considerable effort to act in accordance with General Data Protection Regulation (“**GDPR**”), California Consumer Privacy Act (“**CCPA**”) and other applicable data protection regulations.

b. In Terms of Related Person

This Policy includes different Data Subjects with various motives such as somehow accessing, signing up, signing in to Favoritan Platform and having a premium account on it. Even though Data Subject may be referred as Visitor or User according to their intention for using Favoritan Platform, they will be covered in this Policy.

c. In Terms of Data

Information that makes it possible for related person to be identified directly or indirectly by any other person (“**Personal Data**”) is in the scope of this Policy. Accordingly, it can be safely said that confidential information, which cannot be considered as Personal Data, is excluded from this Policy.

4. Identity of Favorites Group as a Data Controller

For any and all data processing that occurs through accessing the Favoritan Platform, Favorites Group, Inc. residing at 16912 Coastal Highway, Lewes/Delaware is a data controller (“**Controller**”).

5. Occasions for Personal Data Processing

Favorites Group processes personal data during including without limitation below-mentioned situations:

- accessing to Favoritan Platform,
- creating an account on Favoritan Platform,
- using Favoritan Platform,
- providing feedback to Favorites Group,
- purchasing and using premium services,
- contacting with Favorites Group regarding different requests and questions.

6. Principles for Processing Personal Data

Favorites Group considers below-mentioned principles while Processing Personal Data:

- Processing Personal Data lawfully, fairly and in a transparent manner in relation to the Data Subject,
- Processing Personal Data accurately and where necessary, kept up to date,
- Processing Personal Data for specific, explicit, and legitimate purposes,
- Processing Personal Data relevantly, limitedly and proportionately to the purposes for which they are processed,
- Processing Personal Data in a manner that ensures appropriate security of the Personal Data and kept in a form which allows identification of Data Subjects for no longer than it is necessary for the processing reasons.

7. Processed Personal Data

Personal Data Collected By Us
Name-Surname
E-mail Address
Phone Number
Profile Picture
Country
City
Birth Date
Gender
Language Preference
Feedback
Answer

Personal Data Collected By Us
Cookie
User Feedback
IP Address
Login Data
Device & Browser Type
Usage Information

8. Reasons and Legal Bases for Processing Personal Data

Personal Data given to or collected by us shall only be processed when necessary for a reasonable cause and when there is a legal basis for processing. Reasons and legal bases of processing are listed limitedly in this Policy and this Policy will be updated if a reason or a legal basis change.

a. First Name and Last Name

Processing Reasons	Legal Bases
Creating an account	Entering into a contract
Making name-surname data searchable in Favoritan Platform	The data being made manifestly public by the Data Subject

b. E-Mail Address

Processing Reasons	Legal Bases
Creating an account	Entering into a contract
Notifying about your purchased premium account	Performance of a contract
Notifying about changes in the Favoritan Platform	Performance of a contract
Guiding for password renewal	Performance of a contract

c. Birth Date

Processing Reasons	Legal Bases
Creating a personalized account	Legitimate interest

d. Phone Number

Processing Reasons	Legal Bases
Allocating an account to the phone number	Legitimate interest
Providing log in to Favoritan Platform	Performance of a contract
Notifying about changes in the Favoritan Platform	Performance of a contract

e. Country Data

Processing Reasons	Legal Bases
Adding a location mark for the questions & answers	Legitimate interest

f. City Data

Processing Reasons	Legal Bases
Adding an optional location mark for the questions & answers	Legitimate interest

g. Profile Picture

Processing Reasons	Legal Bases
Enabling User to personalize their account on Favoritan Platform	The data being made manifestly public by the Data Subject

h. Gender

Processing Reasons	Legal Bases
Adding a gender mark for the questions & answers	Legitimate interest

i. Answers

Processing Reasons	Legal Bases
Enabling Users to see answers for a specific question	The data being made manifestly public by the Data Subject

j. Feedback

Processing Reasons	Legal Bases
Improving Favoritan Platform	Legitimate interest

k. Language Preference

Processing Reasons	Legal Bases
Enabling User to use Favoritan Platform with preferred language	Performance of a contract

l. User Feedback

Processing Reasons	Legal Bases
Improving Favoritan Platform	Legitimate interest

m. Usage Information

Processing Reasons	Legal Bases
Improving Favoritan Platform	Legitimate interest

n. Cookie

Processing Reasons	Legal Bases
Improving Favoritan Platform	Legitimate interest

o. IP Address

Processing Reasons	Legal Bases
Complying with legal obligation	Legal obligation

p. Login Data

Processing Reasons	Legal Bases
Improving Favoritan Platform	Legitimate interest

q. Device & Browser Type

Processing Reasons	Legal Bases
Improving Favoritan Platform	Legitimate interest

9. Rights of Data Subjects

Data Subjects are endowed with some rights to ensure their Personal Data to be processed on a lawful basis. Favoritan Platform is designed in compliance with the Privacy by Design and Data Protection by Design principles. Therefore, along with the below-mentioned rights, Data Subjects have a right to opt-out from the Favoritan Platform which ends up with their accounts to be deleted.

- a. Right to be informed**, by which the Data Subject may request information about their Personal Data being processed by Favorites Group.
- b. Right of access**, by which the Data Subject may request to learn their Personal Data being processed by Favorites Group.

- c. **Right of rectification**, by which the Data Subject may request Favorites Group to correct or complete their Personal Data.
- d. **Right to restrict processing**, by which the Data Subject may request to limit the way their Personal Data is used.
- e. **Right to erasure**, by which the Data Subject may request to have their Personal Data erased.
- f. **Right to data portability**, by which the Data Subject may request to receive their Personal Data in a machine-readable format and/or request Favorites Group to transfer their Personal Data to another controller.
- g. **Right to object**, by which the Data Subject may request Favorites Group to stop processing their Personal Data.
- h. **Rights in relation to automated decision-making**, by which the Data Subject may request Favorites Group to stop processing their personal data in cases where Personal Data is being processed via automated decision-making.

10. Transfer of Personal Data

Favorites Group transfers Personal Data to third parties only when there is an explicit and informed consent from the Data Subject except for the below-mentioned cases, which have their own legal bases for the transfer:

- a. **Law Enforcement and Judiciary Authorities:** Favorites Group may be obliged to disclose Personal Data when required to do so by law, including but not limited to legal claims, legal investigations, lawful requests or legal proceedings.
- b. **Mobile Application Server and Infrastructure Services Provider:** Name-Surname, E-mail Address, Country, City, Profile Picture, Phone Number, answers to questions and Gender data may be transferred to the company providing server and infrastructure services in the U.S. for Favoritan Platform.
- c. **Third-Party Marketing Services:** Usage Information, User Feedback and Cookie data may be transferred to Facebook and Google in order to conduct marketing and remarketing activities, helping us to keep Favoritan Platform's basic functions free.

[Facebook Pixels and SDKs - Firebase or Google Analytics SDKs | Google AdSense for Website and Google Admob for Mobile App advertising]

Such transferring activity is limited to the usage of Facebook Pixel, Facebook Software Development Kits (SDK), Google Software Development Kits (SDK), Google AdSense and Google AdMob. To limit



such activity, for the tracking purposes, Users should check their device settings to activate “Limit Ad Tracking” function. Users may also visit www.facebook.com/ads/settings and www.adssettings.google.com to opt-out such tracking activities.

11. Period of Retention

Favorites Group stores Personal Data in view of Data Minimization Principle, which necessitates Personal Data to be kept only for the required period. Required period is assigned considering the nature of the Personal Data, the potential risks of a Personal Data breach, processing reasons, and whether or not such reasons can be achieved in a different manner.

12. Methods of Securing Personal Data

Appropriate technical and organizational measures are enacted to ensure the safety, protection and the encryption of the Personal Data in order to prevent any Personal Data breach such that may be caused by accidental or unauthorized destruction, loss, theft or; unauthorized use, alteration and disclosure.

In this context, Favorites Group;

- a. Sign non-disclosure agreements with parties who have limited or unlimited access to Personal Data.
- b. Organize awareness trainings about data protection inside its organization.
- c. Entitles its employees with limited authorization according to their work line.
- d. Transfer Personal Data on a ‘need-to-know’ basis.
- e. Process and store personal data on safely secured and encrypted cloud servers.

13. Contact Information of Favorites Group

Data Subjects may contact Favorites Group in case of having questions, comments, or feedback via info@favoritan.com and Favoritan Website.