

## Privacy Notice (GDPR/KVKK)

We know that you care how information about you is used and shared and we appreciate your trust in us to do that carefully and sensibly. This privacy notice describes how we collect and process your personal information through **BUYO** website and application that reference this Privacy Notice.

### Controllers of Personal Information

BUYO, Inc is the data controller of personal information collected and processed through BUYO Services.

### What Personal Information About Customers Does BUYO Collect?

We collect your personal information in order to provide and continually improve our products and services.

Here are the types of personal information we collect:

**Information you give us:** we receive and store any information you provide in relation to BUYO Services.

**Automatic information:** we automatically collect and store certain types of information about your use of BUYO Services, such as information about your use, including your interaction with content and services available through BUYO Services. Like many websites, we use cookies and other unique identifiers and we obtain certain types of information when your web browser or device accesses BUYO Services and other content served by or on behalf of BUYO on other websites.

**Information from other sources:** we might receive information about you from other sources, such as updated delivery and address information from our carriers, which we use to correct our records and deliver your next purchase more easily. Click here to see examples of the information we receive.

### For What Purposes Does BUYO Process Your Personal Information?

We process your personal information to operate, provide, and improve the BUYO Services that we offer our customers. These purposes include:

**Purchase and delivery of products and service:** We use your personal information to take and handle orders, deliver products and services, process payments, and communicate with you about orders, products and services, and promotional offers.

Provide, troubleshoot, and improve BUYO Services. We use your personal information to provide functionality, analyse performance, fix errors, and improve usability and effectiveness of the BUYO Services.

**Recommendations and personalisation:** We use your personal information to recommend features, products, and services that might be of interest to you, identify your preferences, and personalise your experience with BUYO Services.

**Provide voice, image and camera services:** When you use voice, image and camera services, we process your voice input, images, videos, and other personal information to respond to your requests, provide the requested service to you, and improve our BUYO services

**Advertising:** We use your personal information such as your interactions with BUYO sites, content, or services to display interest-based ads for features, products, and services that might be of interest to you. We do not use information that personally identifies you to display interest-based ads. To learn more, please read our Interest-Based Ads notice .

**Fraud prevention and credit risks:** We process personal information to prevent and detect fraud and abuse in order to protect the security of our customers, BUYO, and others. We may also use scoring methods to assess and manage credit risks.

**Comply with legal obligations:** In certain cases, we collect and use your personal information to comply with laws. For instance, we collect from sellers information regarding place of establishment and bank account information for identity verification and other purposes.

Communicate with you. We use your personal information to communicate with you in relation to BUYO Services via different channels (e.g., by phone, email, chat).

Purposes for which we seek your consent. We may also ask for your consent to process your personal information for a specific purpose that we communicate to you. When you consent to

our processing your personal information for a specified purpose, you may withdraw your consent at any time and we will stop processing of your data for that purpose.

**What About Cookies and Other Identifiers?**

We use cookies and similar tools to enhance your shopping experience, provide our services, understand how customers use our services so we can make improvements, and display ads. Approved third parties also use these tools in connection with our display of ads.

**Does BUYO Share Your Personal Information?**

Information about our customers is an important part of our business and we are not in the business of selling our customers' personal information to others. BUYO shares customers' personal information only as described below and with BUYO, Inc. and the subsidiaries that BUYO, Inc. controls that are either subject to this Privacy Notice or follow practices at least as protective as those described in this Privacy Notice.

**Transactions involving third parties:** We make available to you services, products, applications, or skills provided by third parties for use on or through BUYO Services. For example, you can order products from third-party sellers through our stores. We also offer services or sell product lines jointly with third-party businesses, such as co-branded credit cards. You can tell when a third party is involved in your transactions and we share customers' personal information related to those transactions with that third party.

**Third party service providers:** We employ other companies and individuals to perform functions on our behalf. Examples include fulfilling orders for products or services, delivering packages, sending postal mail and e-mail, removing repetitive information from customer lists, analysing data, providing marketing assistance, providing search results and links (including paid listings and links), processing payments, transmitting content, assessing and managing credit risk, and providing customer service. These third-party service providers have access to personal information needed to perform their functions, but may not use it for other purposes. Further, they must process the personal information in accordance with this Privacy Notice and as permitted by applicable data protection laws.

**Business transfers:** As we continue to develop our business, we might sell or buy other businesses or services. In such transactions, customer information generally is one of the transferred business assets but remains subject to the promises made in any pre-existing Privacy Notice (unless, of course, the customer consents otherwise). Also, in the unlikely event that BUYO, Inc. or substantially all of its assets are acquired, customer information will of course be one of the transferred assets.

**Protection of BUYO and others:** We release account and other personal information when we believe release is appropriate to comply with the law; enforce or apply our Conditions of Use and other agreements; or protect the rights, property, or safety of BUYO, our users or others. This includes exchanging information with other companies and organizations for fraud protection and credit risk reduction.

Other than as set out above, you will receive notice when personal information about you might be shared with third parties and you will have an opportunity to choose not to share the information.

**Transfers out of the European Economic Area:** Whenever we transfer personal information to countries outside of the European Economic Area, we ensure that the information is transferred in accordance with this Privacy Notice and as permitted by the applicable laws on data protection. We rely on European Commission adequacy decisions or use contracts with standard safeguards published by the European Commission (you can ask Customer Service for a copy of these).

**How Secure is Information About Me?**

We design our systems and devices with your security and privacy in mind.

We work to protect the security of your personal information during transmission by using encryption protocols and software.

We follow the Payment Card Industry Data Security Standard (PCI DSS) when handling credit card data.

We maintain physical, electronic, and procedural safeguards in connection with the collection, storage, and disclosure of personal customer information. Our security procedures mean that we may ask to verify your identity before we disclose personal information to you.

Our devices offer security features to protect them against unauthorized access and loss of data. You can control these features and configure them based on your needs. Click here for more information on how to manage the security settings of your device.

It is important for you to protect against unauthorized access to your password and to your computers, devices, and applications. We recommend using a unique password for your BUYO account that is not utilized for other online accounts. Be sure to sign off when you finish using a shared computer. For more information on how to sign off, click here.

### **What Information Can I Access?**

You can access your information, including your name, address, payment options, profile information, Household settings, and purchase history in the "Your Account" section of the website.

### **Are Children Allowed to Use BUYO Services?**

BUYO doesn't sell products for purchase by children. We sell children's products for purchase by adults. If you're under 18, you may use BUYO Services only with the involvement of a parent or guardian.

### **How Long Do We Keep Your Personal Information?**

We keep your personal information to enable your continued use of BUYO Services, for as long as it is required in order to fulfil the relevant purposes described in this Privacy Notice, as may be required by law such as for tax and accounting purposes, or as otherwise communicated to you. For example, we retain your transaction history so that you can review past purchases (and repeat orders if desired) and what addresses you have shipped orders to, and to improve the relevancy of products and content we recommend.

### **EU General Data Protection Regulation – Legal Basis**

The EU GDPR requires a legal basis for our use of personal information. Our basis varies depending on the specific purpose for which we use personal information. We use:

Performance of a contract when we provide you with products or services, or communicate with you about them. This includes when we use your personal information to take and handle orders, deliver products and services, and process payments.

Our legitimate business interests and the interests of our customers when we improve BUYO services (including when we use your voice, video, or camera input to improve services), when we detect and prevent fraud and abuse in order to protect the security of our customers, ourselves, or others, and when we provide you with interest-based advertising.

Your consent when we ask for your consent to process your personal information for a specific purpose that we communicate to you. When you consent to our processing your personal information for a specified purpose, you may withdraw your consent at any time and we will stop processing of your data for that purpose.

Compliance with a legal obligation when we use your personal information to comply with laws. For instance, we collect seller place of establishment and bank account information for identity verification purposes.

These and other legal bases depending on the purpose for which we use personal information.

### **Contacts, Notices & Revisions**

If you have any concern about privacy at BUYO or want to contact one of our data controllers, please contact us with a thorough description and we will try to resolve the issue for you.

Our business changes constantly and our Privacy Notice will change also. You should check our website frequently to see recent changes. Unless stated otherwise, our current Privacy Notice applies to all information that we have about you and your account. We stand behind the promises we make, however, and will never materially change our policies and practices to make them less protective of customer information collected in the past without the consent of affected customers.