

## GENERAL DATA PROTECTION STATEMENT

As **Simmortals Technology International B.V.** (TIN: NL868347711B01) (**'Simmortals'** or **"Company"**) Located at "BUITENPLEIN 64 1181 ZE AMSTELVEEN"; we pay the utmost attention to the security of your personal data. With this awareness, we give a particular importance to process and preserve the personal data of the natural people whom we interact in accordance with the Law no. 6698 (**"PDPL"** or **"the Law"**), secondary legislations (regulation, declaration etc.) and binding resolutions of Personal Data Protection Committee.

As a result of our sense of responsibility, we, as the **"Data Controller"** process your personal data considering legal limitations and purposes mentioned below; by providing all necessary technical and administrative measures to ensure the appropriate level of security, to prevent unlawful processing of personal data and unlawful access to personal data and to ensure the protection of personal data.

This disclosure statement aims to announce the personal data processed by **Simmortals** in relation to the relevant persons it comes into contact with while carrying out its main activity on the website with the domain name [www.simmortals.com](http://www.simmortals.com) (**"Site"**) in full compliance with the **principle of transparency**. and within this text, the Data Protection Statement is made regarding the personal data processing activities within the scope of the Company's main activity and business operations.

### 1. Identity of the Data Controller

Simmortals offers an innovative digital memorial service that brings together physical and digital memorial spaces, aiming to preserve personal stories, memories, and recollections over the long term and facilitate their intergenerational transmission. The company is a platform that enables users to securely create, store, and share content related to their loved ones through its developed technology infrastructure.

### 2. Purposes of Personal Data Processing

Your personal data shall be collected and processed by the Company within the limits specified in the Law, in a limited and measured manner in accordance with the law, in good faith and always related to the following purposes of;

- Carrying out the necessary work by the Company's business units and conduct activities in this direction in order to ensure that the commercial activities carried out by the Company are performed in accordance with the legislation and Company policies,
- Determining, planning and performing the Company's short, medium, and long-term commercial policies,
- Managing customer relations, corporate communications, and data security processes,
- Ensuring commercial and legal security of real and legal people with who are in a business relation with the Company,
- Execution of service sales processes and execution of after-sales support services,
- Determination of marketing analysis and service marketing activities,
- Execution of business and business continuity activities and service production & operation processes,
- Managing risk assessment processes and ensuring the security of data controller operations.

### 3. Personal Data Collection Methods and Cause of Actions

Your personal data transmitted by you directly in oral, written, or electronic media are processed by the Company by automatic or semi-automatic means, and by non-automatic methods on the condition that they form part of a data recording system, through websites or similar applications and software used within the scope of Company activities.

In this regard, the general personal data classified below is processed based on the cause of actions stated in Article **5/2** of the Law.

While creating the classification below, both the execution of the Company's business processes, and the website activities have been taken into consideration and the necessary

Data Protection Statements and/or consent notifications regarding each process and operation of the Company are notified to the relevant groups of people in the form of a layered Data Protection Statements or separately through various means.

	Category	Type	Cause of Action for Processing
1.	Identification	Name, surname, date and place of birth, Turkish ID number, photograph,	Processed for the following cause of actions stated in Article 5/2 of the Law; a) if it is expressly provided for by the laws, c) if the processing of personal data of the parties of a contract is necessary, provided that it is directly related to the establishment or performance of the contract, ç) if it is necessary for compliance with a legal obligation to which the data controller is subject, d) if the personal data have been made public by the data subject himself/herself
2.	Contact Information	Address, email address, phone number	
3.	Customer Services	Invoice information, information orders and request information, past order records.	Processed for the following cause of actions stated in Article 5/2 of the Law; a) if it is expressly provided for by the laws, c) if the processing of personal data of the parties of a contract is necessary, provided that it is directly related to the establishment or performance of the contract, ç) if it is necessary for compliance with a legal obligation to which the data controller is subject.
4.	Transaction Safety	IP address information, website login-exit information	Processed for the following cause of actions stated in Article 5/2/f of the Law; if the processing of data is necessary for the legitimate interests pursued by the data controller, provided that this processing shall not violate the fundamental rights and freedoms of the data subject.
5.	Risk Management	Information to manage commercial, technical, and administrative risks	

#### 4. Transfer of Personal Data and Purposes of Transfer

Your personal data may be transferred within the country for the purposes stated above and to ensure the uninterrupted conduct of the Company's commercial activities and business processes, based on your explicit consent as per **Article 8** of the Law. Where necessary, or where explicitly provided for by law, where it is necessary for the data controller to fulfill its legal obligations, or where data transfer is necessary for the establishment, exercise, or defense of a right or for the protection of the legitimate interests of the data controller, provided that such transfer does not harm the fundamental rights and freedoms of the data subject. or protected, and provided that it does not harm the fundamental rights and freedoms of the data subject, within the country in accordance with the legitimate interests of the data controller; and in accordance with **Article 9** of the Law, in the event of incidental transfer, with your explicit consent or if one of the appropriate safeguards specified in the article is provided, outside the country, with all necessary technical and administrative security measures taken.

- Legally authorized public institutions and organizations, judicial and administrative authorities,
- Private legal entities and natural persons permitted by other legislation,
- Private and public institutions and organizations authorized to audit the Company,
- To business partners from whom services are received or with whom the Company cooperates for the execution and development of its activities,
- To suppliers of the Company only, when necessary,

In this regard, you can withdraw the explicit consent you have given for the transfer at any time and consult with the Company's officials. The relevant data protection statements and consent statements are notified to the related persons in the form of gradual disclosure or in various ways unique to the Company's processes and activities.

## **5. Rights of Data Subjects Under the Law**

You may apply to *Simmortals* at any time, and request to exercise your rights arising from the Article 11 of the PDPL: "a) to learn whether your personal data has been processed, b) to demand for information if your personal data have been processed, c) to learn the purpose of the processing of your personal data and whether these personal data are used in compliance with the purpose, ç) to know the third parties to whom your personal data are transferred in country or abroad, d) to request the rectification of the incomplete or inaccurate data e) to request the erasure or destruction of your personal data under the conditions referred to in Article 7, f) to request reporting of the operations carried out pursuant to sub-paragraphs (d) and (e) to third parties to whom your personal data have been transferred, g) to object to the occurrence of a result against the person himself/herself by analyzing the data processed solely through automated systems, ğ) to claim compensation for the damage arising from the unlawful processing of your personal data". You may submit your requests regarding your rights and the enforcement of the Law by filling out the application form available at [www.simmortals.com](http://www.simmortals.com) or provided by us, or by sending it to us with the minimum requirements listed below;

- Send it with signature "BUITENPLEIN 64 1181 ZE AMSTELVEEN" via notary public, by registered mail with return receipt requested for ease of proof, at your discretion, or by personal application,
- By sending an email to [privacy@simmortals.com](mailto:privacy@simmortals.com) using the email address notified to the company and which is registered in the company's system.

As the personal data owner, in the application you will make to exercise your rights mentioned above and which contains the explanations regarding the right you have request to exercise; the requested matter needs to be clear and understandable, the subject needs to be related to yourself and in case you are acting on behalf of someone else, you will need to submit your special power of attorney certified by the notary in this regard. In accordance with the "Communiqué on The Principles and Procedures for the Request to Data Controller", it is mandatory to include name-surname, signature, Turkish Identification ("ID") number (for foreigners, nationality, passport number or ID number if any), residential or workplace address for notice, e-mail address, telephone and fax number and the subject of the request in your applications. Applications that do not fulfill such elements will be rejected by Simmortals or directed to the valid application channels.

All registered or unregistered intellectual property rights such as title, business name, trademark, patent, logo, design, information and method contained in this Site belong to the site operator and owner brand or the person signified and are under the protection of national and international law. Visiting this Site or utilizing the services on this Site does not give any rights to the intellectual property rights in question. The information contained on the Site cannot be reproduced, published, copied, presented and/or transferred in any way. The whole or part of the Site cannot be used on any other website without permission.

All employees of Simmortals are equipped with education on the Law on the Personal Data Protection Law, periodically informed, highly aware and have gained the notion of confidentiality. Simmortals acts with awareness and sensitivity in all activities carried out by the Company and throughout the life cycle of personal data within the Company. Each related persons who visits the [www.simmortals.com](http://www.simmortals.com) website is deemed to have accepted the above mentioned terms.

**This data protection statement has been updated on 20.12.2025.**