

CARNY PRIVACY POLICY

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Carny (hereinafter also “**Carny**”, “**we**”, “**us**”), a Carny Technology Company registered in Turkey with the MERSIS number 0203075379900001 in ISTANBUL TRADE REGISTRY OFFICE and incorporated and registered in Turkey, operates <https://carny.io/> website and Carny apps for iOS and Android (“collectively referred to as the “**Service**”).

While providing our Service, we recognize the importance of your privacy and carry out our activities in line with the applicable data protection regulation including the EU General Data Protection Regulation (“**GDPR**”) and other relevant laws and regulations.

This Privacy Policy (“**Policy**”) aims to explain how we collect, use, store, share, dispose of and protect personal data you have chosen to share with us when you access our website or any pages or any tablet or mobile phone applications bearing 'Carny' brand that we are owned and/or operated by us or whenever we otherwise connect with you. By means of this Privacy Policy, we fulfil our obligation under Articles 13 and 14 GDPR to provide information on our processing activities to the relevant data subjects.

Unless otherwise defined in this Privacy Policy, the terms used in this Privacy Policy have the same meanings as in our Terms and Conditions, accessible from <https://carny.io/>

PERSONAL DATA WE COLLECT:

We may collect and process your personal data, including but not limited to:

- Identity Information including your first name, last name, personal ID, date of birth, nationality, account username;
- Communication Information including your e-mail address, social media accounts and phone number;
- Location Information including your residential address, state, city and ZIP/Postal Code;
- Visual and Sensory Information including images that you upload to your user profile;
- Store Preferences including your safe search settings, notification settings, and favorite widgets;
- Transaction Information including your crypto currency wallet address, Ethereum address public blockchain data;
- Usage Information including your device and browser metadata such as IP addresses, operating system type and version, date and time of access, domain name, URLs of visited pages, any referrer URL, interactions with user interface, access provider, and analytics information IP address, domain name, unique device identifiers, type of mobile device, operating system type and version, browser meta data, browser type, browser version, clickstream information;
- Commercial Activity including your trading activity, order activity, deposits, withdrawals, account balances;
- Financial Information including your bank account information;
- Marketing Information including cookies, pixel tags, clear gifs, web bugs, single pixel gifs, and personally submitted preferences, resettable device identifiers;
- Your request and complaint information;
- Other information at our discretion to comply with our legal obligations under applicable law.

1. COLLECTION METHOD OF YOUR PERSONAL DATA:

We may collect personal data in several ways, including, but not limited to;

- Directly from you via e-mail, telephone, website, printed form and other physical and electronic environments,
- From our own records of how you use our services,
- Through other electronic and physical environments,
- From third party companies that provide our Services by way of a co-branded or private-labeled website or companies that offer their products and/or services on our Service.

2. USE OF YOUR PERSONAL DATA

Carny may use your personal data for following purposes:

- create, manage and secure your personal account,
- identify you as a user in our system, carry out the identification processes in accordance with the law,
- provide and maintenance our product and our services,
- 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,
- perform our contractual responsibilities,
- fulfill orders,
- facilitate purchases and other interactions in the Services,
- conduct communication activities including to contact you by email, telephone calls, SMS, or other equivalent forms of electronic communication,
- track advertising tailored to your interests on the Services and other websites,
- conduct marketing activities and marketing analysis,
- send newsletters, surveys, offers, and other promotional materials related to our Services,
- manage our customer and user relationships,
- authenticate the information you provide us,
- enhance a great user experience,
- evaluate system security and stability,
- get outsource services,
- detect, prevent, or investigate security breaches, fraud, and other unauthorized or illegal activity,
- manage our financial and accounting activities,
- provide customer support services,
- evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal data held by us about our Services users is among the assets transferred,
- comply with applicable laws.

3. LEGAL BASIS FOR PROCESSING

We rely on the following legal bases for processing your data:

- You have given consent to the processing of your personal data for one or more specific purposes,
- Processing is necessary for the performance of our contract,
- Processing is necessary for compliance with a legal obligation to which we are subject,
- Processing is necessary for the purposes of our legitimate interests, provided always that such interests are not overridden by your interests or fundamental rights and freedoms which require protection of personal data.

We have a legitimate interest in improving and personalizing our Services based on your needs, requests and suggestions, retaining and evaluating information on your recent visits to our website and how you move around different sections of our website, and contacting you for marketing purposes and promote our services (Recital 47 GDPR), without affecting your fundamental rights and freedoms.

4. DISCLOSURE OF YOUR PERSONAL DATA

The data collected by us may be transferred to third parties in order for the purposes set out in this Privacy Policy. This may, for instance, include our representatives, suppliers, business partners, legally authorized persons and institutions, public authorities and any other relevant roles.

For instance, we may transfer your data to:

- **Service Providers** for business or commercial purposes, including fraud detection and prevention, security threat detection, payment processing, customer support, data analytics, Information Technology, advertising and marketing, network infrastructure, storage, monitoring and analyzing the use of our Services, transaction monitoring;
- **Public Authorities, Legally Authorized Persons and Institutions, Regulators, Government Officials** for protecting or defending the rights or property of Carny or users of the Service, investigating or assisting in preventing any violation or potential violation of the law, this Privacy Policy, or our Terms of Use, in connection with any legal investigation;
- **Business Partners** for offering you certain products, services or promotions
- **Professional Advisors**, including legal, accounting, or other consulting services, for purposes of audits, complying with our legal obligations;
- **Suppliers**, for marketing and sales activities, mailing activities, sending newsletters, targeting activities, serving relevant ads for you, improving our website;

In addition to these, we may disclose your personal data, to fulfill the purpose for which you provide it; for any other purpose disclosed by us when you provide it; or with your consent. Note that we will never sell your data to a third party.

We may also, pursuant to a valid legal process (such as a search warrant, subpoena, or court order), allow access to information in our possession in order to comply with such process and to protect our rights and property. We reserve the right to disclose any data or information obtained from or about you, to third parties in connection with a merger, acquisition, bankruptcy or sale of all or substantially all of our assets, to the extent that this is necessary for the process.

We would like to point out that we transfer your personal data upon the acceptance of our data transfer agreement, which ensures compliance with data protection legislation at an appropriate level of protection, by the party to whom the data will be transferred.

Since we operate on a global basis, your personal information may be transferred and stored in countries outside of European Economic Area. In such an event, we systematically ensure the application of an adequate level of protection of such data by means approved by applicable data protection legislation. You may request a copy of such measures by getting in touch with us through the contact details above.

5. SECURITY OF YOUR PERSONAL DATA

We take all the necessary measures 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 stated in this Privacy Policy and there are adequate controls in place including the security of your personal data.

In order to prevent unauthorized access, maintain data accuracy, and ensure the correct use of information, we have put in place appropriate physical, electronic, and managerial procedures to safeguard and secure the information we collect online.

Some of the measures we take include:

- placing confidentiality requirements on our staff members and service providers;
- conducting awareness training on data privacy for employees;
- destroying or permanently anonymizing personal data when it is no longer needed for the purposes for which it was collected;
- following strict security procedures in the retention and disclosure of personal information to prevent unauthorized access to it;
- using two-factor authentication for transactions;
- using secure communication transmission software that encrypts all information you input on our website before it is sent to us.

However, please remember that no security system, method of transmission over the internet, or method of electronic storage is impenetrable or is %100 secure and we cannot guarantee the absolute security of our systems. In the event that any information under our control is compromised as a result of a breach of security, we will take steps to investigate the situation and, where appropriate, notify those individuals whose information may have been compromised and take other steps, in accordance with any applicable laws and regulations.

6. RETENTION OF YOUR PERSONAL DATA

We will retain your personal data only for as long as they are necessary for the purposes set out in this Privacy Policy and to fulfill the contractual or legal obligations to which we have collected the data. If we no longer have a legal basis or a purpose for processing your personal data, we delete the data immediately. However, if necessary, we may retain your personal data for our compliance with a legal requirement, statutory limitation period, statutory storage requirement, accounting, or reporting obligation or for archiving purposes in the public interest, scientific, or historical research purposes or statistical purposes.

7. MARKETING

For all registrations, we use the double opt-in procedure. After registration through the Services, we will send you a confirmation email to show your wish to receive additional information from us by clicking on a link in that email.

We may also occasionally communicate news, updates, promotions and information relating to our products and services. We shall only do this where you have given us your consent or otherwise where we are permitted to do so under the data protection laws in pursuit of our legitimate interests.

We may share personal data with third parties to help us with our marketing and promotional projects or sending marketing communications.

You can unsubscribe from e-mail at any time, except that we may still send you an email if you request a password reset.

If you want to opt out of receiving promotional and marketing emails, text messages, posts and other forms of communication from us (or our promotional partners), which you might receive in accordance with this section, you can choose one of the following ways:

- Click “unsubscribe” at the bottom of every email we sent you; or
- Contact us at admin@carny.io and request to opt out.

If you do opt out of receiving promotional and marketing messages, we will no longer use or transfer your personal data to third parties for direct marketing purposes. We would like to remind you that we may continue to send transactional or administrative e-mails (e.g. account status and activity updates, respond to your inquiries or complaints etc.) related to our services or your requests for information or materials, even you opt out.

8. TRACKING & COOKIES DATA

We use cookies and similar tracking technologies to track the activity on our Service and we hold certain information.

Cookies are small files that your browser automatically creates and displays on your device (laptop, tablet, smartphone, etc.) when you access the Services. Other tracking technologies are also used such as beacons, tags and scripts to collect and track information and to improve and analyze our Service.

Most browsers accept cookies automatically but allow you to disable them. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.

Examples of Cookies we use:

Strictly Necessary Cookies. We use Session Cookies to operate our Service and deliver it to you.

Preference Cookies. We use Preference Cookies to remember your preferences and various settings.

Analytics Cookies. We use Analytics Cookies to collect information about how you interact with the Services and help us analyze and improve the Services.

Advertising Cookies. We use Advertising Cookies to make advertising messages more relevant to you. They help to display advertisements that are based on your inferred interests, prevent the same ad from appearing too often and ensure that ads are properly displayed.

Security Cookies. We use Security Cookies for security purposes.

9. SERVICE PROVIDERS

We may employ third party companies and individuals to facilitate our Service ("**Service Providers**"), provide the Service on our behalf, perform Service-related services or assist us in analysing how our Service is used.

These third parties have access to your personal data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose. We may use such third-party Service Providers for the following purposes:

a. Analytics

We may use third-party Service Providers to monitor and analyze the use of our Service. Such third-party Service Providers:

- help us to understand how our Customers experience our Services by tracking their movements around our Services;
- track and monitor website traffic and use of our Services;
- collect usage and behavioral information about our Customers and provide financial analysis to make profitable decisions that enhance our Services and business.

b. Payments

We use third-party services for payment processing (e.g. payment processors).

We will not store or collect your payment card details. That information is provided directly to our third-party payment processors whose use of your personal information is governed by their Privacy Policy.

10. LINKS TO OTHER SITES

Our Service may contain links to external sites that are not operated by us. If you click a third party link, you will leave our Service and you will be directed to that third party's site. Such another entity may collect Personal Data or Anonymous Data from you. We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services. Please be aware that the terms of this Privacy Policy do not apply to these outside websites or content, or to any collection of your Personal Data after you click on links to such outside websites.

We strongly advise you to review the Privacy Policy of every site you visit.

11. YOUR RIGHTS:

Under local laws, you may benefit from various rights as a "data subject". You can exercise any of the rights listed below by submitting your request by email to admin@carny.io. Please note that we may reject requests that are excessive or a misuse of the relevant right.

In some cases, we may not be able to give you access to your personal data that we hold, if making such a disclosure would breach our legal obligations to our other customers or if prevented by any applicable law or regulation.

a. If you are resident at Turkey:

Under article 11 of the Personal Data Protection Law No. 6698 (“**KVKK**”), you have the right to request from Carny;

- To learn whether your personal data is processed or not,
- To demand information as to if your personal data have been processed,
- To learn the purpose of the processing of your personal data and whether these personal data are used in compliance with the purpose,
- To know the third parties to whom your personal data are transferred in-country or abroad,
- To request the rectification of the incomplete or inaccurate data, if any,
- To request the erasure or destruction of your personal data under the conditions referred to in Article 7 of the KVKK,
- To request reporting of operations as the rectification of the incomplete or inaccurate data or the erasure or destruction, to the third parties to whom your personal data have been transferred
- To object to the occurrence of a result against you, by analyzing the data processed solely through automated systems,
- To claim compensation for the damage arising from the unlawful processing of your personal data.

b. If you are from the European Economic Area or in certain countries, you are also entitled (with some exceptions and restrictions) to:

- **Access:** You have the right to request information about how we process your personal data and to obtain a copy of that personal data.
- **Rectification:** You have the right to request the rectification of inaccurate personal data about you and for any incomplete personal information about you to be completed.
- **Objection:** You have the right to object to the processing of your personal information, which is based on our legitimate interests.
- **Deletion:** You can delete your account by using the corresponding functionality directly on the service.
- **Automated decision-making:** You have the right to object a decision made about you that is based solely on automated processing if that decision produces legal or similarly significant effects concerning you.
- **Restriction:** You have the right to ask us to restrict our processing of your personal data, so that we no longer process that personal data until the restriction is lifted.
- **Portability:** You have the right to receive your personal data, which you have provided to us, in a structured, commonly used and machine-readable format and to have that personal data transmitted to another organization in certain circumstances.
- **Complaint:** You have a right to lodge a complaint with the authorized data protection authority if you have concerns about how we process your personal data. The data protection authority

you can lodge a complaint with notably may be that of your habitual residence, where you work or where we are established.

c. Your Rights under California Consumer Privacy Act:

Pursuant to the California Consumer Privacy Act of 2018 (“CCPA”), California residents have certain rights in relation to their personal information, subject to limited exceptions. For personal information collected by us during the preceding 12 months that is not otherwise subject to an exception, California residents have the right to access and delete their personal information.

We will not discriminate against any customer that asserts their rights under the CCPA. We will not: (1) deny you goods or services; (2) charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties; (3) provide you a different level of quality of goods or services; or (4) suggest that you may receive a different price or rate for goods or services or a different level of quality of goods or services.

If you are a California resident, you have the right to request certain information from us regarding our information-sharing practices with third parties for direct marketing purposes. To the extent that we share your personal information for direct marketing purposes, you may receive the following information: (1) the categories of information and sources of information that we disclosed to third parties for direct marketing purposes during the preceding year; and (2) the names and address information of third parties that received such information, or if the nature of their business cannot be determined from the name, the examples of the products or services marketed.

To the extent that we sell your personal information to third parties, you also have the right to request that we disclose to you: (i) the categories of your personal information that we sold, and (ii) the categories of third parties to whom your personal information was sold. You also have the right to direct us not to sell your personal information.

California residents may also designate an authorized agent to make a request to access or delete on your behalf. Your authorized agent must submit proof that you have provided them with power of attorney pursuant to Probate Code sections 4000 through 4465. We may deny a request from a purported authorized agent who does not provide proof of authorization to act on your behalf.

12. RIGHT TO WITHDRAW YOUR CONSENT

If you have provided your consent to the collection, processing and transfer of your personal data, you have the right to fully or partly withdraw your consent. To withdraw your consent please contact us via admin@carny.io

Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose(s) to which you originally consented unless there are compelling legitimate grounds for further processing which override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims.

13. COLLECTION OF CHILDREN'S PERSONAL DATA

We do not knowingly collect personal data from children under the age of 18. We encourage parents and legal guardians to monitor their children's Internet usage and to help enforce our Privacy Policy by instructing their children to never provide us personal data without their permission. If you have any concerns about your child's privacy with respect to our services, or if you believe that your child may have provided his/her personal data to us, please contact us via admin@carny.io. We ensure to delete such personal data from our records immediately.

DISCLAIMER: When processing open data from social networks, it might be reasonably impossible to recognize the real age of users. Our verification of the age of users is limited to technically available and reasonable treatment of the information openly provided by the social networks from which we collect the data. In case of fallacious, erroneous or missing age data, the social networks shall be solely responsible for violation of requirements of the GDPR and other data protection laws in relation to the personal data of children.

14. CHANGES TO OUR PRIVACY POLICY

We reserve the right to update and change this Policy from time to time in order to reflect any changes to the way in which we process your personal data or changing legal requirements. Any changes we may make to our Policy in the future will be posted on this page and, where appropriate, notified to you by e-mail or push notification. Changes will be effective immediately when posted on the website. We also recommend you check back frequently to see any updates or changes to our Policy.

15. CONTACT US

If you have any questions or concerns or complaints about our Privacy Policy or our data collection or processing practices, or if you want to report any security violations to us, please contact us via admin@carny.io.