

## Sensewise Privacy Policy

### 1. Who is responsible for data processing activities?

Sensewise is committed to respect your privacy while using our website and products. This Sensewise Privacy Policy (“Policy”) defines the requirements to ensure compliance with the applicable data privacy laws and regulations applicable to Sensewise’s collection, use, and transmission of Personal Data and Sensitive Personal Data for information collected by us about you.

This website is operated by **Sense Danışmanlık ve Teknoloji Çözümleri Anonim Şirketi** (Darüşşafaka Mahallesi Çağdaş Sokak Kılıç Sitesi B Blok No:10/1 Sarıyer İstanbul), a Private Company also referred as Sensewise (“we,” “us” or “our”). This privacy policy (“Policy”) explains how we collect, use and disclose information about our users when you use our mobile application (the “App”), our Web site (the “Site”) and other online products and services that link to this Policy (collectively, the “Service”). We refer throughout this Policy to our users as “User,” “you,” or “your,” and we also refer to users as Potential Customers to denote those visiting or site or requesting information regarding our Services, Customer Company to denote our organizational customer, and Employee User to denote individual employees of Customer Company who are users of the App, the Site, and the Service through their employer.

### 2. What Type of Personal Information Do We Collect?

We collect human resource (“HR”) information, and other information about Employee Users, from the Customer Company or directly from the employee as user of our Services such as:

- **Business contact information**, such as your name, address, phone number, and email address.
- **Current employment information**, such as your company name, job title, job level, team/department, and start date.
- **Identification**, such as government-issued identification documents to comply with global anti-money laundering (AML) and know your customer (KYC) obligations.
- **Location Information**. Certain Services may request permission to access your location.
- **Other information**, such as when you fill in a form on our website, respond to surveys, provide feedback, make a support inquiry, participate in promotions, or otherwise communicate with us.
- **Tracking Information**: When a User visits our Site, we use certain tracking data (“Tracking Information”). We use Google Analytics and Freshdesk for Tracking Information. The following Tracking Information is collected: email address, device ID, IP address. We collect your email address, IP addresses and device information, directly through inclusion of their sdk/pixel or any other information which may be required from time to time. Tracking Information is collected via the Site and our web-applications, as well as via our iOS and android implementations.

### 3. Why do We Collect and Process Your Personal Information? What are the Legal Grounds for our Data Processing Activities?

In general, we collect, store, and use your information to provide you with a safe, smooth, efficient, and customized experience. For example, we may use information collected from you in any one or more of the following ways:

- Provide, maintain, and improve our Service.
- Provide and deliver the Service Customer Company requests and configures, process transactions and send you related information, including confirmations.

- Investigate system issues that impact our ability to provide the Service to Users.
- Send you technical notices, updates, confirmations, security alerts and support and administrative messages.
- Respond to your comments, questions and requests and provide customer service.
- Communicate to Customer Companies with you about products, services, offers, promotions, rewards, and events.
- Monitor and analyze trends, usage, and activities in connection with our Service and improve and personalize the Service.

#### **4. To Whom We May Disclose Your Personal Information?**

In principle, your data will not be shared with third parties unless it is necessary. This is the case when:

- **Authorized Public Authorities:** Your data may be disclosed to public authorities such as tax authorities, courts, and other government authorities for the purposes of carrying out the activities in compliance with the applicable legal regulations, informing the authorized persons, institutions, and organizations, following up and conducting legal affairs including anti-counterfeit and anti-infringement purposes.
- **Service providers.** We engage third party companies and individuals to perform certain functions on our behalf, for example provide cloud computing and storage services or analyze data. These third-party service providers have access to personal information needed to perform their functions, but may not use it for other purposes.
- **Protection of us and others.** We may disclose your personal information if we believe disclosure is appropriate to comply with the law, enforce or apply our terms or agreements, protect the rights, property, or safety of Rippling, or our employees, customers, users, and others. We may also disclose your personal information in connection with investigating and preventing fraud or security issues relating to our Services.
- **With your consent.** We may share personal information with third parties when we have your consent to do so.

#### **5. How long do we retain your personal information?**

We keep your personal information for as long as it is required in order to fulfill the relevant purposes described in this Privacy Notice, or for other essential purposes such as complying with our legal obligations, resolving disputes and enforcing our agreements.

Further, your data will be kept as long as it is necessary to comply with applicable legislation regarding product guarantee and safety and in order to follow up with you on the results of our services. Your Data will be further retained as long as required by applicable local law or to the extent we have a legitimate and lawful purpose to do so.

#### **6. Tracking Tools and Cookies**

Cookies are text information that is stored on your device via the internet browser.

Cookies have distinct functions:

Essential cookies are necessary to ensure the functioning of the website. Without them the website would not work. For these we do not need consent. For all other cookies, functional cookies, marketing cookies and those to display maps or videos, we ask for your consent.

Detailed information on cookies can be found via this link: [cookie policy](#)

## **7. International Data Transfers**

In order to offer our services, we may transfer your data to third countries outside of the European Union. In case that those countries may not have the same data protection laws as the EU

we will comply with our legal and regulatory obligations in relation to your personal data, including (as necessary) having a lawful basis for transferring personal data and putting appropriate safeguards in place to ensure an adequate level of protection for the personal data. We will also take appropriate steps to ensure the security of your personal data in accordance with applicable data protection laws.

When transferring your personal data outside the EU, we will, where required by applicable data protection laws, ensure that at least one of the following safeguards is implemented: (1) we will only transfer your personal data to countries or organizations that have been deemed to provide an adequate level of protection for personal data by the European Commission, as applicable; or (2) we will use specific contracts approved by the European Commission, commonly known as the “Standard Contractual Clauses” or “SSCs”, which give personal data the same protection it has in the EU.

## **8. How do we secure your personal information?**

We will provide an adequate level of protection for your personal information and make sure that appropriate technical and organizational security measures are in place to protect the personal information against any accidental or unlawful destruction, accidental loss or alteration, unauthorized disclosure or access, and against all other unlawful forms of processing.

However, please note that we cannot guarantee that any of your personal information will be completely safe. Therefore, we encourage you to be careful when using internet to access our websites, online shops, mobile applications, and social media.

## **9. What are your Rights?**

You may have the following rights which you can exercise through the contact details provided in Section 10 below:

- Right of access and information: you have the right to be informed in a concise, transparent, intelligible, and easily accessible form of the Data we hold and the way in which your Data is processed. You also have the right to obtain (i) confirmation as to whether or not Data concerning you is being processed, and, where that is the case (ii) to access such Data and obtain a copy thereof.
- Right to rectification: you have the right to obtain the rectification of your Data. You also have the right to have incomplete Data completed.
- Right to erasure: in some cases, you have the right to obtain the erasure of your Data. However, this is not an absolute right and Sensewise may have legal or legitimate grounds for keeping such Data.
- Right to restriction of processing: in some cases, you have the right to obtain restriction of the processing of your Data.
- Right to data portability: you have the right to receive your Data which you have provided to Sensewise, in a structured, commonly used, and machine-readable format, and you have the right to transmit such Data to another controller without hindrance from Sensewise. This right only applies when the processing of your Data is based on your consent or on a contract and such processing is carried out by automated means.
- Right to object to processing: you have the right to object to processing of your Data when such processing is based on the legitimate interest of Us. We may, however, invoke compelling legitimate grounds for continued processing. You also have the right to object at any time to the

processing of your Data for marketing purposes. To unsubscribe from our marketing communications, you may also use the above channels or simply by clicking on the “unsubscribe” link at the bottom of each communication.

If you have consented to any personal data processing activities, you can withdraw this consent at any time for future processing. Such withdrawal will not affect the lawfulness of the processing prior to consent being withdrawn.

## **10. How to contact us?**

İletişim bilgileri:

[infosenswise@senswise.co](mailto:infosenswise@senswise.co)

adres: Darüşşafaka Mahallesi Çağdaş Sokak Kılıç Sitesi B-Blok No:10, D:1 Sarıyer, İstanbul