# Privacy Policy

Privacy Policy

As Hi5 Academy LLC., within the scope of our commercial relationship, we possess the data of our relevant parties in accordance with and within the limits and rules of the Turkish Commercial Code No. 6102, the Law on the Regulation of Electronic Commerce No. 6563, and the Personal Data Protection Law No. 6698 for the purpose of providing our products and services.

Your security is important to us. Therefore, the personal data you share with us is handled with care and protected.

With this privacy and personal data protection policy, Hi5 Academy LLC. aims to inform you about which personal data is processed, for what purposes, with whom and why the processed data might be shared, our data processing methods and legal grounds, and what your rights are regarding your processed data.

Hi5 Academy shows maximum effort and sensitivity regarding the security of your personal data. As the data controller required by legislation, all personal data obtained within the scope of our business relationship will be processed in accordance with the Personal Data Protection Law and within the limits imposed by applicable legislation, as detailed below.

## Principles Regarding the Processing of Personal Data

As Hi5 Academy LLC., we adopt the following principles:
a) Processing in compliance with the law and honesty,
b) Striving to ensure accuracy and currency,
c) Processing for specific, explicit and legitimate purposes,
d) Being relevant, limited and proportionate to the purpose for which they are processed,
e) Retaining them only for the period prescribed in the relevant legislation or necessary for the purpose they are processed.

## Categories of Personal Data Collected, Collection Methods, and Legal Basis

Personal data is any information that identifies you personally or that can be used directly or indirectly to determine your identity. Hi5 Academy may collect your personal data through your use of Hi5 Academy products and services or during interactions with Hi5 Academy representatives.

The categories of personal data we collect depend on the nature of your interaction with us or the Hi5 Academy services you use.

Personal and/or business contact information including, but not limited to, your IP address and user agent information, name, surname, mailing address, phone number, fax number, email or registered email address provided during membership, may be collected, recorded, stored and updated through automatic or non-automatic means, including via cookies and similar technologies, and sometimes obtained from third parties such as analytics providers, advertising networks, search information providers and technology providers, within the scope and duration of our service and contractual relationship, based on the legitimate interest processing condition.

In line with the data processing conditions stated in Articles 5 and 6 of the Personal Data Protection Law, we collect your data within the scope of our business relationship for the following purposes: compliance with applicable laws, continuity of business processes, provision of products and services to you, protection of your commercial rights, fulfillment of our contractual obligations, execution of operations related to our products and services, and the other purposes listed below:

- \*\*Customer Support and Satisfaction:\*\* Your data is processed to provide comprehensive customer support, deliver a seamless experience, and improve the Hi5 Academy products and services you receive.
- \*\*Communication and Administrative Purposes:\*\* We communicate with you to inform you about Hi5 Academy products and services, respond to your inquiries or requests, complete product and service transactions and related post-transaction support, and fulfill legally required communications. Under the relevant law (Law on the Regulation of Electronic Commerce, Article 6/2), commercial electronic messages can be sent without separate consent if the recipient has provided their contact information for the purpose of being contacted.
- \*\*Transaction Support:\*\* Your data is processed to complete purchases of our products or services, process payments, fulfill deliveries, and provide technical support during the process.
- \*\*Security:\*\* We process your data to ensure the integrity and security of our websites, products, and services, and to prevent security threats, fraud, or other illegal or malicious activities that could compromise your information.
- \*\*Business Operations:\*\* Your data is processed for ordinary business activities including service delivery, business research and analytics, corporate reporting and management, and quality assurance practices (such as analyzing or recording calls to customer support).
- \*\*Research and Innovation:\*\* Your data is processed to improve and develop new products and services through research and development tools and data analysis activities.
- \*\*Corporate Communication and Marketing:\*\* Your data is processed to develop Hi5 Academy services, conduct research targeted at you, and deliver products and services.
- \*\*Legal Compliance:\*\* Your data is processed to properly deliver our services and products, protect ourselves and our customers, respond to laws, regulations, court orders, and requests from government and law enforcement authorities, and resolve disputes.

In addition to the above purposes, your personal data is also processed for information security procedures, finance and accounting operations, and ensuring the secure operation of data controller activities.

## Purpose of Processing Your Personal Data

Your personal data is collected through our service points, communication channels (phone, email, fax, social media, call center, website, surveys), automatic technologies or interactions (see cookie policy), third parties or public sources (various third parties assisting in the delivery of services), official institutions, our applications, and partner support service providers, as well as closed-circuit recording systems, in accordance with the principles defined in the Law.

Moreover, within the scope of our commercial activities, your personal data is processed pursuant to the Turkish Commercial Code No. 6102, Turkish Code of Obligations No. 6098, Law on the Regulation of Electronic Commerce No. 6563, Regulation on Commercial Communication and Commercial Electronic Messages No. 30998, Occupational Health and Safety and Tax Legislation obligations, which include both commercial and financial responsibilities and workplace safety conditions in your trade processes.

All data you provide is processed, automatically or non-automatically, for the purposes of ensuring quality and accurate delivery of contractual services, measuring and improving service quality, providing information about services, sending announcements and alerts, conducting customer satisfaction activities, fulfilling data retention, reporting and disclosure obligations requested by public institutions, fulfilling our legal obligations as a data controller, establishing and performing the contract, asserting, using and protecting rights, as long as the data processing purpose is valid.

## Transfer of Personal Data

Your personal data may be transferred to third parties, domestic or international, with whom we have business relationships, contractual relationships, or cooperation, including entities that provide or receive services, and upon request to judicial and administrative authorities, provided that necessary technical and administrative measures are taken.

## Cases Where Personal Data May Be Processed Without Explicit Consent

While explicit consent is one of the legal bases for data processing under Article 5 of the Law, it is not the only one. Within the scope of our business relationship, personal data may be processed without explicit consent if any of the following conditions apply:

a) Explicitly stipulated by laws,
b) Necessary to protect the life or physical integrity of a person who cannot express consent due to actual impossibility or whose consent has no legal validity,
c) Directly related to the establishment or performance of a contract and necessary for processing personal data of the parties to the contract,
ç) Necessary for the data controller to fulfill its legal obligation,
d) Publicly disclosed by the data subject,
e) Necessary for the establishment, exercise or protection of a right,
f) Necessary for the legitimate interests of the data controller provided that it does not harm the fundamental rights and freedoms of the data subject.

## Your Rights as the Data Subject

Pursuant to Article 11 of the Personal Data Protection Law, everyone may apply to the data controller and exercise the following rights:
a. To learn whether personal data is being processed,
b. To request information if personal data has been processed,
c. To learn the purpose of processing personal data and whether they are used accordingly,
d. To know third parties, domestic or international, to whom personal data is transferred,
e. To request correction if personal data is incomplete or inaccurate,
f. To request deletion or destruction of personal data,
g. To request notification of third parties to whom personal data has been transferred regarding actions taken pursuant to (e) and (f),
h. To object to results against oneself arising solely from automated systems,
i. To claim compensation for damages arising from unlawful processing of personal data.

You can exercise these rights by contacting us at ceo@academyhi5.com.

## How to Exercise Your Rights

In accordance with Article 13(1) of the Personal Data Protection Law and the Communiqué on the Procedures and Principles of Application to the Data Controller published in the Official Gazette No. 30356 dated March 10, 2018, you can submit your request to exercise the above rights with the following information:

Required information in the application:
1. Full name of the applicant.
2. If the applicant is a Turkish citizen, Turkish ID number; if not, nationality and passport number or identity number if available.
3. Applicant’s address for notification or workplace address.
4. Applicant’s email address, phone number or fax for contact.
5. Subject of the request.
6. Supporting information and documents related to the request.

Application methods:
1. The applicant may deliver the request in a sealed envelope labeled “Request for Information pursuant to the Personal Data Protection Law” in person to Hi5 Academy LLC.’s headquarters.
2. The applicant may send a notarized notification to Hi5 Academy LLC.’s headquarters with the same label.

## Response Time for Personal Data Requests

Your requests regarding your personal data will be evaluated and answered within 30 (thirty) days from the date of receipt. If your application is rejected, a reasoned refusal will be sent to the address you provided via email or mail.

## Information Updates, Changes, and Contact

Hi5 Academy LLC. may modify this Privacy Policy at any time to keep it up to date and compliant with applicable legislation. The updated Privacy Policy will be posted on the Hi5 Academy website. You can always access the current version at https://academyhi5.com. Continued use of Hi5 Academy’s services or applications after changes are made constitutes acceptance of those changes. The updated policy becomes effective on the date it is published on the website. You can help ensure your contact information and preferences are accurate, complete, and up to date via the website. You may request correction of inaccurate personal data or deletion of data that is not required to be retained by law or for legitimate business purposes.

You are free to decide whether to allow processing of only the necessary personal data for analytics purposes as described in this policy. Continued use of the site will be deemed your acceptance. For detailed information, please contact us at ceo@academyhi5.com.

Title: Hi5 Academy LLC.
Address: 72 Hurst Ter Wayne, NJ 07470 USA
Phone: +1 201-503-4618
Email: ceo@academyhi5.com