

SUMMARY

Below is a summary of some key terms of this Privacy Policy. This summary is for your reference only and does not form part of the Privacy Policy.

We at Shadow Yazılım Limited Şirketi listen to our users and we are committed to protecting the principles of privacy and fair use that underpin our values to offer a transparent and secure service. We want you to be confident that your personal data is safe and secure with us.

This Privacy Policy explains the following:

- how we collect your personal data;
- what personal data we collect;
- how we use your personal data;
- who we share your personal data with;
- what measures we take to keep your personal data safe;
- how long we keep your personal data
- age limits and
- the rights and choices you have when it comes to your personal data.

Privacy Policy

Last modified: 14 December 2022

1. Who are we?

When we say “CIKCIK” “our,” “we,” or “us,” we’re talking about Shadow Yazılım Limited Şirketi. This Privacy Policy (“Privacy Policy”) applies to all of our apps, services, games, features, software and website (together, “Services”) unless specified otherwise.

This Privacy Policy explains how we will use personal data about you and the steps we take to ensure your personal data is kept secure and confidential. It should be read together with our [Terms of Service](#).

2. How do we collect personal data?

We may obtain personal data from you through the websites, mobile applications or other similar devices, channels or applications operated by or on behalf of Shadow Yazılım Limited Şirketi.

3. What personal data do we collect?

We collect personal data about you when you give this to us in the course of registering for and/or using our Services for example we may collect your name, address, username, e-mail address or telephone number. In addition, we may also collect your height and weight data in order to provide our services properly.

Note that it is your responsibility to check and ensure that all data, content, material or data you provide us is correct, complete, accurate and not misleading.

Data that you may provide voluntarily

Certain parts of our Services may ask you to provide personal data voluntarily. For example, we will ask for certain data in order for you to register for an account with us, to begin using our Services, to subscribe to marketing communications from us, and/or to submit enquiries to us, such as:

- Contact and correspondence data (such as name and email address);
- User name and password;
- Profile data (such as profile photo and biography); and

- Other data you choose to give us (such as data to identify a lost account).

The personal data that you are asked to provide, and the reasons why you are asked to provide it, we will try to explain to you at the point we ask you to provide your personal data.

When using our services, in addition to providing data about yourself by creating a profile during your account creation process, you also provide data when you take certain actions that are intended to be public in nature, such as when you post content, follow a channel, or create and broadcast a channel under our services. Considering the social interaction nature of our services, personal data such as shared text, audio recording, photo, video/image recording information and chat content can be viewed, used or disclosed by other users participating in the live broadcast. The same applies when you interact with another user using our chat service.

We would like to point out that if your profile is public, your content will be visible to everyone on the Platform and may be accessed by your friends and followers, or accessed or shared by third parties such as search engines, content aggregators and news sites. You can determine who will view your uploaded video. Alternatively, you can change your account to "Personal Account" in Settings.

Data that may be collected automatically

When you use our Services and if you have given express consent, we may also collect data automatically from you and/or your device which may be considered personal data under applicable data protection laws, such as:

- Data and analytics about your use of our Services;
- Your IP address and mobile device identifiers (such as your device ID, advertising ID, MAC address, IMEI);
- Data about your device, such as device name and operating system, browser type and language;
- Data we collect with cookies and similar technologies;
- Broad geographic location based on your IP address;
- Precise geo-location data (GPS, with your consent); and
- Data about your use of our Services, such as in application interaction and usage metrics.

Advertising ID means Apple Identifier for Advertisers ("IDFA") on Apple and Google Advertising Identity ("GAID"). These are unique identifiers for mobile device that advertisers use for interest based advertising. They are consistent across all apps and thus allow cross-app tracking. On Apple you can opt-out this by choosing "limit ad tracking" option from privacy settings. On Google Android you can opt-out by choosing "Opt-out of interest based ads".

Advertising IDs are non-permanent, non-personal identifiers, which are uniquely associated with your device. Similar technologies include tracking pixels within ads. These technologies allow companies (including marketers and advertisers) to recognise your device when you use websites and applications.

Data about your device refers to data about your device type, device model, device maker, device operating system and its language or other technical data like screen size or processor, or combination of this data available from a device for a developer for checking the device compatibility with a particular application.

Some of this data may be collected using cookies and/or similar technologies (such as "SDKs" or software development kits), as explained further below.

Data that we may obtain from third party sources

We may receive personal data about you from third party sources. For example, if you clicked on an advertisement to direct you to one of our Services we may be provided with data from which ad-network and advertising campaign the install originated from.

You may choose to connect to our Services via your social media account. Exactly what data we receive from your social media will depend on your social media privacy settings, but it would typically include your basic public profile data such as:

- your username;
- profile picture;
- age range; and
- gender

The data that we may collect from our partners could include;

- Data we receive if you link a third-party tool with our Services (such as Facebook, Apple or Google);
- Demographic data (such as to determine the location of your IP address);
- Data to fight fraud (such as click fraud in advertising);
- Data from platforms that our Services run on (such as to verify payment); and
- Data for advertising and analytics purposes, so we can optimise the Services we deliver to you.

We do not request or intend to collect any special or sensitive categories of data such as any data on health, race, religion, political opinions, sexual preferences or orientation.

4. How do we use your personal data?

We may use your personal data:

1. to **enable you to access and use** the Services. For example;
 - To create user accounts and profiles;
 - To provide you with the correct versions of our applications and/or games; and
 - To send you service related communications including confirmations, technical notices, updates, security alerts, and support or administrative messages
2. to **personalise and improve** aspects of our Services. For example;
 - To respond to your customer support requests;
 - To receive error messages about any issues you / your device encounters with our Services to enable us to fix bugs and interoperability issues;
 - To detecting and preventing illegal activities;
 - To track application installs, for purposes of measuring the effect of our marketing campaigns;
 - To conduct optional user feedback surveys;
 - To remember you next time you visit one of our Services; and
 - Communicate with you about promotions, rewards, upcoming events, and other news about products and services offered by us.
3. to **communicate** with you, including some or all of the following:
 - To provide you with in-app offers and rewards based on your interaction with our Services;
 - To serve you with relevant targeted advertisements;
 - To make you offers to purchase in-app items on discount based on your activity with our application and your purchase history; and
 - To send you marketing communications and/or newsletters if you have subscribed for them about rewards and promotions.
4. for **research**, such as analysing market trends and customer demographics;

5. To **comply** with legal obligations, including to prevent and/or detect fraud or provide disclosure to the authorities when required by applicable law.

Our chat feature, which allows its users to share text, audio recordings, photos, video / video recordings among themselves, is only supported among application users, and personal data such as text, sound recording, photo, video / video recording shared in chat (chat) end-to-end encrypted and securely stored end-to-end encrypted and by taking the necessary security measures, and that no one, including the developers, can see and read the chat contents.

In case you want to take advantage of the live broadcast features, your user name and your photo, if any, are processed for the purpose of providing and performing the Service. We would like to point out that personal data such as text, audio recording, photo, video/image recording shared in the chat in the relevant broadcast and chat contents are stored end-to-end encrypted and securely by taking the necessary security measures.

We would like to point out that if live broadcasts are used, personal data such as text, audio recording, photo, video / video recording information shared in the chat in the broadcast and chat contents will be visible to the people participating in the live broadcast.

5. Why do we process your personal data?

We will only collect and use your personal data (as described in section 4) in accordance with data protection laws. Our grounds for processing your personal data are as follows:

1. **Consent** – Where necessary we will only collect and process your personal data if you have given your clear and affirmative consent for us to do so.
2. **Legitimate Interests** – We may use and process some of your personal data where we have sensible and legitimate business grounds for doing so. Under European privacy laws there is a concept of “legitimate interests” as a justification for processing your personal data. Our legitimate interests for processing your personal data are for us to enable you access and use of our Services, to communicate with you about our Services and to improve our Services.
3. **Legal obligations** – We may need to process your personal data when we are required to comply with a legal obligation.
4. **Provided that it is directly related to the establishment or performance of the contract, it is necessary to process the personal data of the parties to the contract** - We may need to process your personal data when we provide Services to you or when we communicate with you about the Service. It includes that the receive and administering premium services and packages; and processing personal data to handle payment processes.

6. Who do we share your personal data with?

When you use any of our Services, we may only disclose your personal data to the following parties:

- a) To our group companies, third party services providers and partners who provide data processing services to us. For example, to support the delivery of, provide functionality on, or help to enhance the security of our Services, or who otherwise process personal data for purposes that are described in this Privacy Policy or notified to you when we collect your personal data.
- b) to any competent law enforcement body, regulatory, government agency, court or other third party where we believe disclosure is necessary.
- c) to any other person with your consent to the disclosure.

- d) Your information regarding the payment and payment methods (including payment institutions, PSP (payment service provider), payment broker, payment service provider, technical integrator) of the Services, including those located outside of your region, is the performance, development and analysis of the core service we provide under our Terms of Service agreement; and information on payment and payment methods are transferred to our Business Partners as a third party so that our Company, as data controller, can fulfill its legal obligation.

In addition, your personal data may and will be transferred abroad and processed by our Group Companies, third party service providers and partners located outside the borders of your country, based on your approval. By accepting our terms of Service, you are deemed to have consented to the processing and transfer of your personal data abroad. If you do not accept the processing and transfer of your personal data abroad, you may choose not to use our Services.

7. What cookies do we use?

A cookie is a very small text file placed on your computer or device. We and our partners use cookies and similar technologies to provide and personalise our Services, analyse use, target advertisements and prevent fraud. You can disable cookies in your browser settings, but some parts of our Services may then not function properly.

8. What advertisements do we show on our Services?

The advertisements that you see displayed on our Services are delivered on our behalf by certain third-party advertising companies. No data which identifies you, for example your name, address, email address or telephone number, is used to provide this advertising. In order to display advertising most likely to be relevant to you, these third-party advertisers may place or recognise a unique cookie on your browser. This cookie does not collect personal data about you nor is it linked to any identifiable data about you. By using our Services, you are consenting to the use of these third-party cookies for these purposes.

If you would like more data about online advertisements and your choices about how this data may be used by these companies, please find more data here <http://www.youronlinechoices.com/uk/your-ad-choices>.

9. What steps do we take to keep your personal data safe?

Your personal data's security is very important to us. This is why, where it's appropriate, we use HTTPS to help keep data about you secure. However, no data transmission over the internet can be guaranteed to be totally secure.

We do our best to keep the data you disclose to us secure. However, we can't guarantee or warrant the security of any data which you send to us, and you do so at your own risk. By using our Services, you accept the inherent risks of providing data online and will not hold us responsible for any breach of security.

if you want to use the channel and chat room features, we would like to point out that personal data such as text, sound recording, photo, video, location information shared in the chat within the relevant channel.

In terms of our chat (chat) feature, which is among our services, personal data such as messaging, text, sound recording, photo, image, video recording and chat contents are sent and received encrypted end-to-end and encrypted and by taking the necessary security measures. We would like to inform you that it is stored safely.

In addition, if you want to take advantage of the live broadcast features, we would like to point out that personal data such as text, sound recording, photograph, video recording, etc., shared in the relevant broadcast, are stored securely in an encrypted form and by taking the necessary security measures.

10. How long do we keep your personal data?

Unless a longer retention period is required or permitted by law, we will only retain your personal data only for as long as reasonably necessary to fulfil the purposes outlined in this Privacy Policy and for our legitimate business interests, such as to comply with our legal obligations, resolve disputes, and enforce our agreements. We will for example periodically de-identify unused user accounts and regularly review our data sets.

11. Do we transfer your personal data outside of the country you are resident?

Our Services are global by nature and your personal data may be transferred to, and processed in, countries other than the country in which you are resident. These countries may have data protection laws that are different to the laws of your country. We take steps to ensure adequate safeguards are in place to protect your data as explained in our Privacy Policy. Adequate safeguards that our partners may use include standard contractual clauses approved by EU Commission and the Privacy Shield certification in case of transfers to the USA.

Your personal data will be transferred to our Group Companies, third party service providers and partners located outside the borders of the your resident country, based on your consent. By accepting our terms of service, you are deemed to have consented to the processing and transfer of your personal data abroad. If we do not accept the processing and transfer of your personal data abroad, you can choose not to use our Services.

12. Age Limits

We do not knowingly collect or solicit personal data about or direct or target interest based advertising to anyone under the age of 18 or knowingly allow such persons to use our Services. If you are under 18, please do not send any data about yourself to us, including your name, address, telephone number, or email address. No one under the age of 18 should provide us any personal data. If we learn that we have collected personal data about a child under age 18, we will delete that data as soon as it is practicably possible.

13. Your personal data rights and how to contact us

You have certain rights under existing data protection legislation including the right to request a copy of the personal data we hold about you, if you request it from us in writing.

- i. Your right to learn whether your personal data is being processed and to request information about it if it is;
- ii. Your right to learn the purpose of processing your personal data and whether they are used in accordance with the purpose;
- iii. Your right to know the third parties to whom your personal data is transferred, at your resident country or abroad;
- iv. **Right to access:** the right to request copies of your personal data from us;
- v. **Right to correct:** the right to have your personal data rectified if it is inaccurate or incomplete;

- vi. **Right to erase:** the right to request that we delete or remove your personal data from our systems;
- vii. Your right to request notification of the transactions set forth in the article v. and vi. to third parties to whom personal data has been transferred.
- viii. **Right to restrict our use of your data:** the right to 'block' us from using your personal data or limit the way in which we can use it;
- ix. **Right to data portability:** the right to request that we move, copy or transfer your personal data;
- x. **Right to object:** the right to object to our use of your personal data including where we use it for our legitimate interests.
- xi. Your right to object to the emergence of a result against the person himself by analyzing your processed data exclusively through automated systems; and
- xii. Your right to demand the compensation of the damage in case your personal data is damaged due to unlawful processing.

To make enquiries, exercise any of your rights set out in this Privacy Policy and/or make a complaint please contact us at support@cikcik.app

14.Changes to this Privacy Policy

We reserve the right to amend or modify this Privacy Policy at any time and any changes will be published on our Services. The date of the most recent revision will appear on this page. If we make significant changes to this policy, we may also notify you by other means such as sending an email. Where required by law we will obtain your consent to make these changes. If you do not agree with any changes, please do not continue to use our Services.

15. Information Relating to Children

Our Services are intended for general audiences over the age of 18 years old. We do not knowingly collect information from children under the age of 18 years old. If you are not over 18 years old then do not download or use our services. If you believe that we may have personal information from or about a child under the age of 18 years old, please contact us at the applicable email support@cikcik.app (please include your name, mailing address, and email address). Note that we'll attempt to delete the account of any child under the age of 18 that's reported to us as soon as possible. You are responsible for any and all account activity conducted by a minor on your account.

Shadow Yazılım Limited Şirketi
shadow@hs09.kep.tr