

PRIVACY AND COOKIE POLICY – ÖZGE

www.özge.com

Effective date: 15 September 2020

Özge Bold Global Styling Agency (“we”, “us”, “our” and “Özge”) respects your privacy and is committed to taking reasonable steps towards protecting your privacy online and managing your information responsibly, in order to best understand the services that are most useful to you. The personal data will be processed in accordance with the laws of Turkey concerning internet privacy laws and international regulations such as the GDPR (applies since 25 May 2018), CCPA (applies since 1 January 2020) and all other international laws and regulations applicable to the jurisdiction of Özge.

For the purposes of the General Data Protection Regulation - GDPR (Regulation (EU) 2016/679, the “GDPR”), Özge Bold Global Styling Agency is the “data controller” (as defined in the GDPR) of the personal data, when it determines the purposes and means of the processing of personal data. Özge cares about your privacy and wants you to be familiar with how we collect, use and disclose data. This Privacy Statement covers the collection, use and disclosure on this Site where the statement is linked.

In addition, under the GDPR:

‘Personal data’ means any information relating to you and that identifies you, directly or indirectly;

‘Processing’ means any operation or set of operations which is performed on personal data or on sets of personal data.

Please note that any links to third party websites on Özge as partners are governed by their own privacy statements. Additionally, Özge contents may be subject to their own statements specific to the product or content and such statement will apply to the applicable privacy or content. Please read the following carefully as it explains our views and practices regarding your personal information, and how it is handled. By accessing or browsing our website, you confirm that you have read, understood and agree to this policy in its entirety.

If you do not agree with the practices described in this policy, you should not use our website. By providing us with your data, you warrant to us that you are of legal age to perform such activities on your own.

Types of Data We Collect. “Personal Data” means data that allows someone to identify or contact you, including, for example, your name, address, telephone number, e-mail address, as well as any other non-public information about you that is associated with or linked to any of the foregoing data. “Anonymous Data” means data that is not associated with or linked to your Personal Data; Anonymous Data does not, by itself, permit the identification of individual persons. We collect Personal Data and Anonymous Data, as described below.

(a) Information You Provide to Us.

- We may collect Personal Data from you, such as your first and last name, e-mail and mailing address, phone and password when you create an account to log in to our site.

- We retain information on your behalf, such as files and messages that you store using your Account.
- If you provide us feedback or contact us via e-mail, we will collect your name and e-mail address, as well as any other content included in the e-mail, in order to send you a reply.
- We also collect other types of Personal Data that you provide to us voluntarily, such as your operating system and version, product registration number, and other requested information if you contact us via e-mail regarding support for the Services.
- We may also collect Personal Data, such as at other points in the Services that state that Personal Data is being collected. (b)Information Collected via Technology.
- To make our Services more useful to you, our servers (which may be hosted by a third party service provider) collect information from you, including your browser type, operating system, Internet Protocol (IP) address (a number that is automatically assigned to your computer when you use the Internet, which may vary from session to session), domain name, and/or a date/time stamp for your visit.

Use of Your Personal Data

In general, Personal Data you submit to us is used either to respond to requests that you make, or to aid us in serving you better. We use your Personal Data in the following ways:

- identify you as a user in our system;
- provide improved administration of our Services;
- improve the quality of experience when you interact with our Services;
- send you a welcome e-mail to verify ownership of the e-mail address provided when your Account was created;
- send you administrative e-mail notifications, such as security or support and maintenance advisories;
- respond to your inquiries related to employment opportunities or other requests, and
- to send newsletters, surveys, offers, and other promotional materials related to our Services and for other marketing purposes including those of third parties.

Creation of Anonymous Data.

We may create Anonymous Data records from Personal Data by excluding information (such as your name) that make the data personally identifiable to you. We use this Anonymous Data to analyze request and usage patterns so that we may enhance the content of our Services and improve Site navigation. We reserve the right to use Anonymous Data for any purpose and disclose Anonymous Data to third parties in our sole discretion.

Disclosure of Your Personal Data.

We disclose your Personal Data as described below and as described elsewhere in this Privacy Policy.

(a)Third Party Service Providers. We may share your Personal Data with third party service providers, including, but not limited to, stylists, to: help schedule in-home beauty services, conduct online chat, provide you with the Services; to facilitate creation of accounts; to provide technical support; and/or to provide other services.

(b)Affiliates and Acquisitions. We may share some or all of your Personal Data with our parent company, subsidiaries, joint ventures, or other companies under a common control (“Affiliates”), in which case we will require our Affiliates to honor this Privacy Policy. If another company acquires our company, business, or our assets, that company will possess the Personal Data collected by us and will assume the rights and obligations regarding your Personal Data as described in this Privacy Policy.

(c) Other Disclosures. Regardless of any choices you make regarding your Personal Data (as described below), we may disclose Personal Data if we believe in good faith that such disclosure is necessary

(a) in connection with any legal investigation;

(b) to comply with relevant laws or to respond to subpoenas or warrants served on us;

(c) to protect or defend our rights or property or that of other users of the Services; and/or

(d) to investigate or assist in preventing any violation or potential violation of the law, this Privacy Policy, or Terms and Conditions.

Third Party Websites.

When you click on a link to any other website or location, you will leave our Site and go to another site and another entity may collect Personal Data or Anonymous Data from you. We have no control over, do not review, and cannot be responsible for, these outside websites or their content. Please be aware that the terms of this Privacy Policy do not apply to these outside websites or content, or to any collection of data after you click on links to such outside websites.

Your Choices Regarding Your Personal Data

(a)Choices. We offer you choices regarding the collection, use, and sharing of your Personal Data.

(a.i)We will periodically send you free newsletters and e-mails that directly promote the use of our Services. When you receive newsletters or promotional communications from us, you may indicate a preference to stop receiving further communications from us and you will have the opportunity to “opt-out” by following the unsubscribe instructions provided in the e-mail you receive or by contacting us directly (please see contact information below).

(a.ii)Despite your indicated e-mail preferences, we may send you service related communication, including notices of any updates to our Terms of Use or Privacy Policy.

(b)Changes to Personal Data. You may change any of your Personal Data in your Account by sending an e-mail to us at the e-mail address set forth below. You may request deletion of your Personal Data by us, but please note that we will keep all transactions as business records and may be required to keep other information and not delete it (or to keep other information for a certain time, in which case we will comply with your deletion request only after we have fulfilled

such requirements). When we delete any information, it will be deleted from the active database, but may remain in our archives. We may retain your information for fraud prevention or similar purposes.

Security of Your Personal Data.

We are committed to protecting the security of your Personal Data. We use a variety of industry-standard security technologies and procedures to help protect your Personal Data from unauthorized access, use, or disclosure. We also require you to enter a password to access your Account information. Please do not disclose your Account password to unauthorized people. No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, while we use reasonable efforts to protect your Personal Data, we cannot guarantee its absolute security.

FOR USERS FROM EEA / EU - Your rights under the GDPR

If you are a resident of the European Economic Area (EEA), you have certain data protection rights. Özge aims to take reasonable steps to allow you to correct, amend, delete, or limit the use of your Personal Data.

If you wish to be informed what Personal Data we hold about you and if you want it to be removed from our systems, please contact us.

In certain circumstances, you have the following data protection rights:

- The right to access, update or to delete the information we have on you. Whenever made possible, you can access, update or request deletion of your Personal Data directly within your account settings section. If you are unable to perform these actions yourself, please contact us to assist you.
- The right of rectification. You have the right to have your information rectified if that information is inaccurate or incomplete.
- The right to object. You have the right to object to our processing of your Personal Data.
- The right of restriction. You have the right to request that we restrict the processing of your personal information.
- The right to data portability. You have the right to be provided with a copy of the information we have on you in a structured, machine-readable and commonly used format.
- The right to withdraw consent. You also have the right to withdraw your consent at any time where Özge relied on your consent to process your personal information.

Please note that we may ask you to verify your identity before responding to such requests.

You have the right to complain to a Data Protection Authority about our collection and use of your Personal Data. For more information, please contact your local data protection authority in the European Economic Area (EEA).

NOTICE FOR U.S. - CCPA

Section effective as of: January 1, 2020

We are required by the California Consumer Privacy Act of 2018 (“CCPA”) to provide to California residents an explanation of how we collect, use and share their Personal Information, and of the rights and choices, we offer to California residents concerning that Personal Information.

Personal information that we collect, use, and share. We do not sell personal information. As we explain in this Privacy Policy, we use cookies and other tracking tools to analyze website traffic.

Your California privacy rights. The CCPA grants California residents the following rights. However, these rights are not absolute, and in certain cases we may decline your request as permitted by law.

- **Information.** You can request information about how we have collected, used and shared and used your Personal Information during the past 12 months.
 - The categories of Personal Information that we have collected.
 - The categories of sources from which we collected Personal Information.
 - The business or commercial purpose for collecting and/or selling Personal Information.
 - The categories of third parties with whom we share Personal Information.
 - Whether we have disclosed your Personal Information for a business purpose, and if so, the categories of Personal Information received by each category of third party recipient.
 - Whether we’ve sold your Personal Information, and if so, the categories of Personal Information received by each category of third party recipient.
- **Access.** You can request a copy of the Personal Information that we have collected about you during the past 12 months.
- **Deletion.** You can ask us to delete the Personal Information that we have collected from you.

You are entitled to exercise the rights described above free from discrimination in the form of legally prohibited increases in the price or decreases in the quality of our Service.

How to exercise your California rights. You may exercise your California privacy rights described above as follows:

- **Right to information, access and deletion.** You can request to exercise your information, access and deletion rights, by emailing contact@ozgestyling.com. We reserve the right to confirm your California residence to process your requests and will need to confirm your identity to process your requests to exercise your information, access or deletion rights. As part of this process, government identification may be required. Consistent with California law, you may designate an authorized agent to make a request on your behalf. In order to designate an authorized agent to make a request on your behalf, you must provide a valid power of attorney, the requester’s valid government-issued identification, and the authorized agent’s valid government issued

identification. We cannot process your request if you do not provide us with sufficient detail to allow us to understand and respond to it.

- **Request a list of third party marketers.** California's "Shine the Light" law (California Civil Code § 1798.83) allows California residents to ask companies with whom they have formed a business relationship primarily for personal, family or household purposes to provide certain information about the companies' sharing of certain personal information with third parties for their direct marketing purposes during the preceding year (if any). You can submit such a request by sending an email to contact@ozgestyling.com with "Shine the Light" in the subject line. The request must include your current name, street address, city, state, and zip code and attest to the fact that you are a California resident.

We cannot process your request if you do not provide us with sufficient detail to allow us to understand and respond to it.

COOKIE POLICY

What Are Cookies

To enhance your experience with our site, we may use "cookies." Cookies are text files that may be stored in your computer's browser (i.e. in memory for the duration of the active session) or on the user's hard drive to store your preferences and perform other administrative functions. We use cookies to understand site usage and to improve the user experience, create personalized offerings, and improve the content and offerings on our site.

Managing Cookies

You can control and/or delete cookies as you wish – for details, see aboutcookies.org. You can delete all cookies that are already on your computer and you can set most browsers to prevent them from being placed. If you do this, however, you may have to manually adjust some preferences every time you visit our website or use our Platform and some services and functionalities we offer may not work.

To restrict or handle cookies, please see the 'Help' section of your internet browser.

Changes

Any modifications to this Privacy Policy will be effective upon our posting the modified version. In all cases, your continued use of the Service after the posting of any modified Privacy Policy indicates your acceptance of the terms of the modified Privacy Policy.

Contact Us

Özge welcomes your comments or questions regarding this Privacy Policy. Please email us at contact@ozgestyling.com for any questions.

We reserve the right to modify this Privacy Policy at any time. If we make material changes to this Privacy Policy, we will notify you by updating the date of this Privacy Policy and posting it on the Sites. If required by law we will also provide notification of changes in another way that we believe is reasonably likely to reach you, such as via e-mail or another manner through the Service.