

42GEARS PRIVACY POLICY

We 42Gears Mobility Systems Private Limited and its affiliates and subsidiaries (“we”) respects its users’ (“User”/ “You”/” Customer”/” Your”) privacy and appreciates Your concern to protect Your privacy. This Privacy Notice has been adopted by us to inform You of how we handle and process the information that You share with us. Unless otherwise defined in this Privacy Notice, the terms used in this Privacy Notice have the same meanings as in our Terms and Conditions. The purpose of this Privacy Notice is to outline how we have established measures to protect Your privacy rights in accordance with the GDPR (EU General Data Protection Regulation), California Consumer Privacy Act, other applicable Privacy regulations as well as the laws of India (together “Applicable Laws”) where 42Gears Mobility Systems Private Limited (the Parent Company) is incorporated. This Privacy Notice also enumerates the measures we take to safeguard the personal information which we obtain and how You can contact us about our privacy and security practices. By using our services and this website, You agree to the collection and use of information in accordance with this Privacy Notice. This Privacy Notice only applies to You in case we are acting as a “DATA CONTROLLER” for processing or using Your personal data.

WHEN DOES THIS PRIVACY NOTICE APPLY?

This Notice covers how we collect and use your data, e.g.

- When you visit or use our websites, applications or social media channels.
- Purchase and use our products, services, systems or applications.
- Subscribe to our newsletters or other marketing communications.
- Provide to us your goods or services.
- Contact our customer support.
- Join our business events; or otherwise interact with us (directly or indirectly) in your capacity as consumer, business customer, partner, (sub) supplier, contractor or other person with a business relationship with us.

Kindly note that In case we are acting as a Data Processor on behalf of our Customers in the course of providing our services, the Privacy statement shared by the Data Controller will apply, and our data processing agreement/addendum with such Customer will govern our processing of your Personal Data.

WHAT TYPES OF DATA WE COLLECT?

We collect some information to conduct our regular business operations and administration that may include some personal information such as name, email address and contact details. We outline this below as:

- Data collected from website users.
- Data collected through the use of our products and services; and
- Other data such as information that You provide us etc.

PERSONAL DATA

Personal data is the information relating to an individual who can be directly or indirectly identified from that data. Identification of personal data can be through reference to the information itself, or in conjunction with any other information in our possession or is likely to come into such possession. Further, Personal Data shall mean any information relating to an identified or identifiable natural person as defined by the General Data Protection Regulation of the European Union ("GDPR" EC-2016/679).

CUSTOMER DATA

We may receive, store or process certain information including personally identifiable information on behalf of our customers. For the purpose of this Privacy Notice, we are a Data Controller of Your Personal Data as and when You directly use/purchase our products and services. Data Controller means the natural or legal person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal information are, or are to be, processed.

However, in case You entrust any of Your data including Your customers or employees data through any of our structured means such as Resellers, Partners or distributors, we manage such data as a data processor or sub processor (Processor means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller and Processor use another organization is sub processor) whatever the case may be. The data You entrust to us for processing is called Customer Data.

This Customer Data may include information from devices or other systems that the Customer manages and monitors using our services or products. It could also include end user data related to an individual's activities on Customer's network and systems including, but not limited to, email address, IP address, device information, CPU usage and any other data related to addressing a support or service request. Under GDPR we are primarily a data processor for Customer Data.

We do not sell or intend to sell or rent any personal data of Yours being collected, processed or stored in our systems in any manner whatsoever.

HOW WE COLLECT DATA

DATA COLLECTED FROM WEBSITE USERS

When You visit our website or seek to conduct business with us You may be prompted to provide certain personal information such as name, email address, mobile number, and geographic location etc. This information is used by us in the following ways:

- Help us connect with You or to establish communication at Your request.
- Collect Your Email address to subscribe to our newsletters.
- Register for webinars.
- Enquire about our products and services.
- Register or apply to our Partner Program

Generally, the personal information You provide to us is necessary to provide You with the information You have requested for and to resolve a complaint or address Your query.

We may also collect the personal information disclosed by You on our forums, blogs and testimonials or to any platforms to which You are able to post information and materials including third party services (such as social media channels) and through our any other Offerings. We will obtain prior consent to post Your name and photograph along with the testimonial. In case of You are not providing us with a consent, We are merely permitted to use Your testimonial in a fully anonymized way.

We may also collect billing and transactional details of the Customer during their purchase of our products or services. We work with industry-standard payment providers to collect payment.

Please note that providing personal information to us is voluntary on Your part. If You choose not to provide us certain information, we may not be able to offer You certain products or services, and You may not be able to access certain features provided on our website.

Our servers automatically collect certain information when You visit our website. This information does not necessarily reveal Your identity directly, but it may include information about the specific device used, such as the hardware model, operating system version, web-browser software (such as Firefox, Safari, or Internet Explorer) and the Internet Protocol (IP) address/MAC address/device identifier. In some countries, including the European Economic Area, this information may be considered personal information under the GDPR. We do not use this information to identify You, and do not process this information actively. The collection is a by-product of using the website. We include these in our log files to understand more about visitors to our websites.

This information helps our websites work correctly, provide information about our products and services, and supports our efforts to understand our customers' interests.

INFORMATION FROM APPLICATION LOGS AND MOBILE ANALYTICS

We collect information about your use of our products, services and mobile applications from application logs and in-house usage analytics tools and use it to understand how your business use and needs can improve our products. This information includes clicks, scrolls, features accessed, access time and frequency, errors generated, performance data, storage utilized, user settings and configurations, and devices used to access and their locations.

REQUESTING INFORMATION OR EVENT REGISTRATION

You may sign up to receive information about our company, our products and services, industry news and information, access our partner portal and register to attend an event. Based on your consent, we may send you electronic communications to keep you informed of changes to our products and services.

Your personal data will be accessed by our authorized personnel to deliver the requested information and market to you in compliance with this Privacy Notice. We may also provide your personal data to third-party service providers to help us deliver the information you requested, support event activities, or provide updates about our products and services. Third-party service providers are not permitted to use Your information for any other purposes and are required to adhere to personal data protection laws.

DATA COLLECTED THROUGH THE USE OF OUR PRODUCTS AND SERVICES

Usage Data: Where our customers subscribe to our products and services we collect certain technical information obtained from software, systems hosting the services or products and devices accessing these products and services which do not directly identify the end user herein referred to as Usage Data. We collect this information for business analytics to identify how our products and services are used by our Customers. The extent of this collection is configurable by our customers, but as an indication, our collection of technical information that constitutes personal data includes (but is not limited to):

IP Address, Email address, Company name, Mobile number, Device Time, Device Model, RAM Information, Storage Information, Bluetooth Information, Data Usage details, Password Strength, Device Notes, Other usage statistics

We do not collect usage details about Customer's end users, except as necessary for support or to provide the Services requested by Customers (in which case we are a data processor of such data). The information is only processed to provide the service requested by the Customer.

Location Related Information: We give our users more control over how our applications collect location data from their devices.

Whenever You elect to provide access for the location based information while using our SureMDM Nix Agent, we collect such location data for the purposes including, but not limited to location tracking, Geo-Fencing etc etc..

With Your consent, our Products may also collect additional asset related information such as IMEI, IMSI, Phone Number, Serial Number etc only for the purpose necessary for support or to provide the services requested by the user.

In addition, some of the features of our Product may enable us to access Your location in order to customize Your experience with the Service based on Your location ("Location based Services"). In order to use certain Location based Services, You must enable certain features of Your device such as GPS, WiFi, and Bluetooth, which will enable us to identify Your location through a variety of means, including GPS location, IP address, geo-fencing technology, as available. The Location-based Services feature in our Products is powered by Google Maps.

(Please make sure You check and agree with Google Maps

<https://policies.google.com/privacy?hl=en-US> and terms of use)

In case the user enables the location services and provides their express consent by way of the device settings while using our Service, our application will collect location data even when the application is running in the background.

The data stored on your mobile device and their location information to which the mobile applications have access will be used in the context of the mobile application and transferred to and associated with your account in the corresponding services.

Call Logs Related Information: With the clear and explicit prior consent of our users, we may further request access or permission to certain features from Your mobile devices, including but not limited to Your device’s Call logs, Contacts, etc. for the purpose of collecting data for inventory management, call tracking, incoming/outgoing call restrictions and accessing SIM Card information for IT administrators. The administrators may configure SureMDM to collect usage information, such as the number of calls, statistics (number of calls made or received, duration of calls, contact information etc.)

The SureMDM will be able to read Your Call logs including contact name, phone number, duration of the call which is transmitted and stored in our secure SureMDM server. This information is available even when the application is running in background or is not actively used. The call log information stored in the server will never be shared with any third party or applications for any reason whatsoever.

SMS Related Information: With clear and explicit prior consent, the SureMDM may be configured by the IT administrator to collect the text messages sent or received. This information may assist the administrator in managing SMS limits on the user cellular plan.

Based on how the administrator has configured SureMDM Agent, the data may include:

- The number of SMS sent or received; and
- Contact name date and time
- Contact name date and time

The aforesaid collection of the SMS logs is limited to the legitimate purpose(s) mentioned herein and stored in our secure SureMDM server which is never shared or transferred to any third party or applications. This information is available even when the application is running in background or is not actively used.

Storage Usage: This is a SureMDM functionality that allows access to a device’s internal and external storage. When enabled, SureMDM may collect the contents of the device storage, including the SD card and locally stored files. Also, based on how the user has configured SureMDM Agent, certain functionality may allow administrators to have read, write, delete, modify and execute access to the device file system.

The Storage Usage information is transmitted and stored in our secure SureMDM server. This allows administrators to download, upload and execute files on the device remotely, even when the application is running in the background or is not actively used.

For further information about SureMDM Agent’s other data collection and purpose(s), kindly have a look at our Security and Compliance Page which talks about the **“Required App Permissions”**.

Contacts: If You choose to enable the functionality of “Contacts”, the SureMDM Agent will be able to collect Your Contact Information including contact name, phone number, even when the app is running in the background or is not actively being used.

This will allow your SureMDM Administrator to allow or block the incoming and outgoing calls based on the contact information, and remotely delete a contact.

Further, Contact details may be transmitted and stored on our SureMDM secure server for purposes of generating reports for SMS and Call logs. The data stored in the server is never shared with any third party or applications and processed only in accordance with applicable privacy regulations, including Art. 6 Para. 1 (f) GDPR on the basis of our legitimate interest.

SURELOCK ACCESS

We provide our users the ability to control the types of information they collect about user's devices: SureLock will allow us to capture the SMS content, Call Logs, Storage, Location, All Files Access in order to function properly and for the purpose of the administrator to change passwords through received SMS Commands, block or allow phone calls, and SMS and others.

Based on how the administrator configured the run-time permissions, the data may include but is not limited to:

SureLock will read only the "Phone Number" to allow/block the incoming and outgoing calls with Call log permission.

SureLock can read "Name of contact", "content of the SMS" in order to change the Android lock screen PIN with SMS permission.

The details are mentioned below:

Call Logs Related Information: With the clear and explicit prior consent of our users, we may further request access or permission to certain features from Your mobile devices, including but not limited to Your device's Call logs, Contacts, etc. for the purpose of collecting data for inventory management, call tracking, incoming/outgoing call restrictions and accessing SIM Card information for IT administrators.

The administrators may configure SureLock to collect usage information, such as the number of calls, statistics (number of calls made or received, duration of calls, contact information etc.). The SureLock will be able to read Your Call logs including contact name, phone number, duration of the call which is transmitted and stored in our secure server. This information is available even when the application is running in the background or is not actively used. The call log information stored in the server will never be shared with any third party or applications for any reason whatsoever.

SMS Related Information: With clear and explicit prior consent, the SureLock may be configured by the IT administrator to collect the text messages sent or received. This information may assist the administrator in managing SMS limits on the user cellular plan.

Based on how the administrator has configured SureLock, the data may include:

- The number of SMS sent or received; and
- Contact name date and time
- Content of the SMS, etc.

The aforesaid collection of the SMS logs is limited to the legitimate purpose(s) mentioned herein and stored in our secure server which is never shared or transferred to any third party or applications. This information is available even when the application is running in the background or is not actively used.

Contacts: If You choose to enable the functionality of “Contacts”, the SureLock will be able to collect Your Contact Information including contact name, phone number, even when the app is running in the background or is not actively being used. This will allow your SureLock Administrator to allow or block the incoming and outgoing calls based on the contact information, and remotely delete a contact.

Further, Contact details may be transmitted and stored on our secure server for purposes of generating reports for SMS and Call logs. The data stored in the server is never shared with any third party or applications and processed only in accordance with applicable privacy regulations, including Art. 6 Para. 1 (f) GDPR on the basis of our legitimate interest.

SUREVIDEO

- **Access to All Files Permissions:** SureVideo has the ability to read all your files on the device storage (including all the documents, pictures, and music), which allows the administrator to remotely configure application settings, set up a custom album view, and add playlists.

Allowing SureVideo to have file system access allows you to use the full functionality for the aforementioned purpose(s).

SureVideo will request this access, and You can choose to allow or deny the request as per your preference. SureVideo maintains privacy by not sending or storing this data to its server. Further, SureVideo doesn't transfer or share this information with any other third-party application for any reason whatsoever.

- **Location Permission:** If enabled, SureVideo will be able to read your location data which includes access to your precise and approximate location. The location data is collected to allow Your SureVideo administrator to search and connect to the desired network via the Wi-Fi center plugin. The location data captured shall never be shared by SureVideo with any other third-party application.

No location data is sent or stored in the server as the data is merely required to derive the scan results to connect to the desired wifi network.

CAMLOCK PERMISSIONS

We use the similar app permissions such as Accessibility settings, background location, runtime permissions etc to function Camlock properly which is a part of our SUREMDM product.

For further details, please refer: <https://www.42gears.com/security-and-compliance/>.

COOKIES

Our website uses “cookies”, which are files in text format placed on Your (User's) computer, to help the website analyze how Users use the site. The cookie provides information about Your use of the website (including Your IP address) for the purpose of evaluating and compiling reports on website activity and internet usage. You may refuse the use of cookies by selecting the appropriate settings on Your browser, however, please note that if You do this You may not be able to use the full functionality of this website.

- **Examples of Cookies we use:** For analytics and performance: These cookies help us understand how you use our services and use that data to optimize and improve our services. For example, we use Google Analytics cookies to understand how visitors arrive at our website, which content they read or spend their time on, identify areas such as website navigation, user experience and marketing campaigns.

Targeting Cookies or Advertising Cookies: These cookies collect information about your browsing habits in order to make advertising relevant to You and Your interests. They remember the websites You have visited, and that information is shared with other parties such as advertising technology service providers and advertisers. In addition to our own cookies, We use some third-party cookies to report usage statistics of the service, deliver advertisements on and through the service, and so on. We also use a third-party application Crazy Egg for tracking and analyzing the activities of our website visitors. To find out Crazy Egg 's Privacy Practice and data security, please refer to the link here <https://www.crazyegg.com/privacy>. However, in case you wish to opt-out of the Crazy Egg's services click on the link provided: <https://www.crazyegg.com/opt-out>

- **How to opt-out:** To opt-out from the cookies, you can configure your browser through appropriate settings. However, you will not be able to opt-out from cookies which are “absolutely necessary” for our services.

Links to third-party cookie providers and their privacy/opt-out pages:

- Google Analytics: [Google Analytics Cookie Policy](#)
- LinkedIn: [LinkedIn Cookie Policy and LinkedIn Ads](#)
- Intercom: [Intercom Cookie Policy](#)
- Facebook: [Facebook Cookie Policies](#)
- Google AdWords Conversion: [AdWords Setting](#)

For Customers in the European Union, our processing (use) of Your personal information is justified on the following legal basis:

- The processing is necessary to perform a contract with You or take steps to enter into a contract at Your request; This is the primary basis of our processing. Further we provide you the option to disable the cookies before visiting our website. However, necessary cookies will be active for the functioning of the website.

OTHER DATA

42Gears shall record, analyze and use your interactions with us, including email, telephone, chat conversations or any other electronic medium with our sales and customer support professionals, for improving our interactions with you and other customers.

INFORMATION THAT WE COLLECT FROM THIRD PARTIES

- **Signups using federated authentication service providers:** You can log in to our Services using supported sign in services such as Microsoft and Google. These services will authenticate your identity and provide you the option to share certain personal information with us, such as Your name and email address or any other personal information
- **Referrals:** In case if someone has referred any of our products or services to You through any of our referral programs, that person may have provided us your name, email address and other personal information. You are free to ask us for the deletion of this data. The information collected will merely be used for the specific purpose for which it was collected.
- **Information from our resellers and service providers:** If you contact any of our reselling partners, or otherwise express interest in any of our products or services to them, the reselling partner may pass your name, email address, company name and other information to us. If you register for or attend an event that is sponsored by us, the event organizer may share your information with us. We may also receive information about You from review sites if you comment on any review of our products and services, and from other third-party service providers that we engage for marketing our products and services.
- **Information from social media sites and other publicly available sources :** We may collect Your publicly available information, including profile information such as when You provide your feedback or reviews about our products, interact, or engage with us marketplaces, review sites or social media sites such as Facebook, Twitter, LinkedIn, Google and Instagram through posts, comments, questions and other interactions.
We collect such information to allow us to connect with You, improve our products, better understand customer's reactions and issues, or publish Your feedback on our websites. Further, in case You delete the data from the mentioned sites, the information may remain with us to update it.

For Customers in the European Union, our processing (i.e., use) of Your personal information is justified on the following legal basis:

- the processing is in our legitimate interests, subject to Your interests and rights, and notably our legitimate interest in using applicable data to conduct and develop our business activities; or
- You have clearly consented to the processing of Your personal data for a specific purpose.

TRUSTED THIRD PARTY TOOLS WE USE

INTERCOM

We also use “Intercom”, a live chat platform that connects Users with our customer support team and during this process we collect some personal information such as name, email address and contact number with the express consent of the Users in order to start the conversation. The messages and data exchanged are stored within the Intercom application and Freshdesk. For more information on the privacy practices of Intercom and Freshdesk, please visit <https://www.intercom.com/terms-and-policies#privacy> and <https://www.freshworks.com/privacy/1-jan-2020/> respectively.

Intercom's visitor data is automatically deleted after 9 months from the last incidence of you visiting our Websites.

- Intercom is committed to and has implemented GDPR compliance in their tools, you can read Intercom's privacy policy and GDPR commitment here:
<https://docs.intercom.com/pricing-privacy-and-terms/data-protection/how-were-preparing-for-gdpr>.

DO NOT TRACK" SIGNALS UNDER CALIFORNIA ONLINE PROTECTION ACT (CALOPPA)

Some internet browsers have enabled Do Not Track (DNT) features, which sends out a signal (called the DNT signal) to the website that you visit indicating that you don't wish to be tracked. This is different from blocking or deleting cookies, as browsers with a Do Not Track feature enabled may still accept cookies. No industry standard currently exists on how companies should respond to Do Not Track signals, although one may develop in the future. Our website is not currently designed to recognize and respond to Do Not Track signals.

SECURITY

The nature of our services is such that we share a responsibility with our Customers for the security of data.

We aim to safeguard and protect Your personal data from unauthorized access, improper use or disclosure, unauthorized modification or unlawful destruction or accidental loss, and have adopted reasonable technical and organizational security measures. In line with 42Gears commitment to ensure protection of Your privacy and establish good business practices we have been certified by industry- standards such as ISO 27001:2013.

It is nevertheless important that our Customers recognize their responsibility in maintaining effective security in the use of our services. While we will use all reasonable efforts to safeguard Your personal data, You acknowledge that the use of the internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal data that transferred from You or to You via the internet.

NOTICE TO END USERS

Many of our Products or Services are intended to be used by the organization or made available through an organization (e.g., your employer), that organization is an administrator of the Services who is responsible and has control over all the related accounts and/or services. In such a scenario, please direct your data privacy related questions to your administrator, as your use of the services is subject to that organization's policies. We don't hold any responsibility for such privacy or security practices of an administrator's organization, which might be different from this Notice.

Administrators are able to:

- require you to reset your account password.
- restrict, suspend or terminate your access to the Services.
- access information in and about your account.
- access or retain information stored as part of your account.
- install or uninstall third-party apps or other integrations

In some cases, administrators can also:

- restrict, suspend or terminate your account access.
- change the email address associated with your account.
- change your information, including profile information.
- restrict your ability to edit, restrict, modify or delete information

Please contact your organization or refer to your administrator's organizational policies for more information.

Even if the Services are not currently administered to you by an organization, if you use an email address provided by an organization (such as your work email address) to access the Services, then the owner of the domain associated with your email address (e.g. your employer) may assert administrative control over your account and use of the Services at a later date. You will be notified by us on the happening of such an event.

- If you do not want an administrator to be able to assert control over your account or use of the Services, use your personal email address to register for or access the Services. If an administrator has not already asserted control over your account or access to the Services, you can update the email address associated with your account through your account settings in your profile. Once an administrator asserts control over your account or use of the Services, you will no longer be able to change the email address associated with your account without administrator approval.
- Please contact your organization or refer to your administrator's organizational policies for more information.

POLICY TOWARDS MINORS OR CHILDREN

We do not knowingly collect or solicit personal information from anyone under the age of 18 or knowingly allow such persons to register for the Services. It has also been provided in our Terms and Conditions for using our website.

In case we become aware that a child under 18 has provided us with personal information, we will take steps to delete such information forthwith. However, in case knowingly or unknowingly You collect or process any information related to children while using our products, You acknowledge and agree to be legally responsible for complying with the applicable laws and regulations related to protection of such personal information without any legal claims against us.

TRANSACTIONAL EMAILS

We may occasionally send you emails about product updates, changes in privacy policy, updates in terms of service, to offer customer support and marketing emails. You shall have the ability to unsubscribe or opt-out from some of these emails from the link provided at the below in the mail.

There may be some transactional emails which we might be necessary in order to provide effective service and to fulfill our contract (including not limited to):

- Updates in Privacy Policy. (You need to know about the changes and may be required to give consent if such changes are made in future that impacts your ability to use the service)
- Updates in Terms of Service. (Changes in Terms of Service may impact your usage of services)
- Payment complete or failure notification. (You have the right to receive the invoice or confirmation of your payment), in case of failure our Support team may get in touch with you.
- Subscription expiry and other service-related concerns. (These two types of emails are necessary for you to effectively use the Service)
- Notification of a data-breach. (we're required by law to inform you about this in case such unfortunate event happens in future)
- Account Notification emails. (Changes in Password, renewal reminders etc)

SOCIAL MEDIA WIDGETS

Our websites include social media features, such as the Facebook Like button, and widgets, such as Twitter "tweet" buttons. These features may collect your Internet protocol address, which page you are visiting on the Websites, and may set a cookie to enable the feature to function properly. Social media features and widgets are hosted by a third party and Your interactions with these features are governed by the privacy statement of the companies that provide them.

PUSH NOTIFICATIONS

We will push notifications through a push notification provider such as Apple Push Notification Service, Google Cloud Messaging or Windows Push Notification Services in case where You have enabled notification on our desktop and mobile applications. You may turn off notifications in the application or device settings to manage Your push notification preferences or deactivate these notifications.

OUR ONGOING EFFORTS TO BE TRANSPARENT

We continue to make available necessary information to help our Users better understand 42Gears processing of personal information and how to exercise choices regarding the use of Your personal information through various channels including this Privacy Notice and any other relevant information that may be made available timely on our website or on Your devices.

FURTHER INFORMATION

This Privacy Notice applies to all the products/services offered by us. Each of our third-party service providers have their own privacy policies/notice. You acknowledge that Your visit to any third-party service provider website will solely be at Your own discretion and risk. We do not claim knowledge of or ownership of any content in any third-party websites nor do we endorse any third-party website.

UPDATES TO THIS NOTICE

This Privacy Notice may be updated from time to time to bring in new security measures (if required) or to comply with applicable laws. You should review this page periodically to ensure that You accept and are compliant with the amended Privacy Notice. Your continued use of this website will constitute Your agreement to this Privacy Notice and any amendments thereto. Changes to this Privacy Notice are effective when they are posted on this Page or by sending You an email.

If You do not agree with any changes to this Privacy Notice, You should stop using the Services forthwith. We value your privacy and your rights as a data subject and have therefore appointed Osano as our privacy representative and your point of contact.

We value your privacy and your rights as a data subject and have therefore appointed Osano as our privacy representative and your point of contact.

Osano International Compliance Service Limited

ATTN: 8T2B

25/28 North Wall Quay

Dublin 1, D01 H104

Ireland

To Exercise your data subject rights or privacy related rights, please fill the [subject access request form](#).

Further, 42Gears has appointed IPTECH LEGAL CONSULTANCY LIMITED COMPANY as our turkey representative as per Turkish Data Protection Law. We have been officially published at VERBIS- Data Controller Registry Information System, refer the following link for your perusal:

<https://verbis.kvkk.gov.tr/Query/Details?q=RGDZ8czL0lwKmqW%2BU2XXfg%3D%3D&isNeviChange=duu6TOm7jzzm1f64DfpShw%3D%3D>

If You have any questions or concerns about this Privacy Notice, please feel free to email us at privacy@42gears.com.

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