

**Privacy Policy** 

Last updated: 31.10.2024

# §1. Introduction

This Privacy Policy describes how Key.study (referred to as "we," "our," or "us") collects, uses, discloses, and protects your personal data in accordance with the Turkish Personal Data Protection Law (KVKK). By using our website and services, you consent to the practices described in this policy.

## §2. Data Controller

Key.study is the data controller for the personal data you provide, and we are responsible for ensuring that your data is handled in compliance with Turkish law.

## §3. Data We Collect

We may collect and process the following types of personal data:

- Full name;
- Email address;
- Phone number;
- Academic records (including but not limited to qualifications, grades, certificates) (if applicable);
- Name of your child (if applicable).

§4. How We Collect Your Data

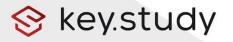
We collect personal data through the following means:

- Website forms;
- Third-party applications;
- Emails;
- Phone calls.

§5. Purpose of Data Processing

We process personal data for the following purposes:

- Educational Consultancy: To provide tailored consultancy services based on academic records and other relevant information.
- Marketing & Communication: To inform you of upcoming webinars, educational opportunities, and promotional offers.
- Customer Support: To handle inquiries and provide support through phone, email, or other communication channels.



• Online Webinars & Events: To manage registrations and participation in online events.

## §6. Data Sharing & International Transfers

We may share your data with the following third parties for legitimate business purposes:

- Affinities of our Company and its Owners: To facilitate business operations.
- Private Schools and Agencies in Poland, Canada, Cyprus, and Ukraine: To provide educational opportunities and consultancy services.

In cases where data is transferred outside of Turkey, we ensure compliance with cross-border data transfer regulations under the KVKK. Where necessary, we will put in place adequate safeguards (such as standard contractual clauses) to ensure your data is protected.

## §7. Legal Basis for Processing

We process personal data based on the following legal grounds:

- Consent: For marketing communications and non-essential services.
- Legitimate Interest: To provide consultancy and customer support, and to share data with third parties for educational purposes.

### §8. Data Retention

We retain personal data only for as long as necessary to fulfill the purposes for which it was collected. This period may vary depending on our contractual and legal obligations. If personal data is no longer required, we will securely delete or anonymize it.

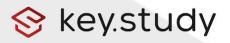
### 9. Security Measures

We take reasonable technical and organizational measures to protect personal data from unauthorized access, loss, alteration, or disclosure. These include:

- Secure servers and encryption protocols.
- Access controls to limit who can view your data.
- Regular review of security practices.

### §10. Cookies & Tracking Technologies

We use cookies and similar tracking technologies to enhance user experience on our website, perform analytics, and improve our services. You can control



cookie settings through your browser and have the option to disable certain types of cookies.

§11. Data Subject Rights (KVKK)

Under the Turkish Personal Data Protection Law (KVKK), you have the following rights concerning your personal data:

- Right to Access: You can request information on whether your personal data is processed by us and request a copy.
- Right to Rectify: You can request corrections if the data we hold is inaccurate or incomplete.
- Right to Erase: Under certain circumstances, you can request the deletion of your personal data (e.g., if it's no longer necessary for the purposes it was collected).
- Right to Restrict Processing: You may request a temporary restriction on the processing of your data under certain conditions.
- Right to Data Portability: You can request that we provide your data in a structured format so it can be transferred to another service provider.
- Right to Object: You may object to the processing of your data based on legitimate interests or for direct marketing purposes.

To exercise your rights, please contact us at means in §13.

§12. Updates to This Policy

We may update this privacy policy from time to time to reflect changes in legal or regulatory obligations or our data processing practices. The latest version will always be available on our website.

§13. Contact Information

For questions regarding this privacy policy or your personal data rights, please contact us at:

Email: info@key.study

Phone: +9 0552 126 44 45

Address: Porta Vadi, Hamidiye Mahallesi, Cendere Caddesi, T3 Blok, No: 103/2, İç Kapı No: 2, Kâgıthane, İstanbul